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ABSTRACT

Research findings relating to the impact of student financial aid policies and practices on women are reviewed. Emphasis is placed on the importance of student aid for improving economic opportunity and security for women. The primary focus is on institutional practices and student aid programs administered by the U.S. Department of Education (Pell Grants, Guaranteed Student Loans, College Work Study, Supplemental Educational Opportunity Grants, National Direct Student Loans, and State Student Incentive Grants). The following concerns are addressed: significant demographic and enrollment trends influencing female participation in student aid; participation rates of women and average awards for the federal student financial assistance programs; problems in enforcing Title IX requirements for achieving equity in student financial assistance; the disproportionate adverse impact on women, and particularly minority women, of federal student aid regulations and institutional practices; problems in the role of the federal government in encouraging women to participate in postsecondary education; and lack of representation of women in federal student aid policy making. Supplementary statistical data are included, along with questionnaires and regulatory information. (SW)

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STUDENT FINANCIAL ASSISTANCE: NEXT STEPS TO IMPROVING EDUCATION AND ECONOMIC OPPORTUNITY FOR WOMEN

****

BY

MARY MORAN

U.S. DEPARTMENT OF EDUCATION
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EXECUTIVE SUMMARY

The landmark Supreme Court decision in Grove City vs. Bell has sparked the most significant challenge, opportunity and test of political leadership among individuals and groups concerned with women's equity, particularly in the area of student financial assistance. The Supreme Court has inadvertently forced federal officials and university administrators to examine and improve equity standards and expectations for helping women to finance a postsecondary education. Improving economic opportunity and economic security for women is a stated federal policy goal, yet student aid policies and practices, the most viable mechanisms for achieving this objective, have not adapted to the economic needs or enrollment patterns of women. Enrollment patterns and economic characteristics of women are substantially different than those of men, necessitating an examination of student aid policies that have a disproportionate adverse impact on women. Even though the rate of inflation seems to be under control, college costs continue to soar, therefore, student aid becomes a critical variable not only in assuring that women are guaranteed access to a postsecondary education but also that they may become more economically self-sufficient.

The findings throughout this report are based mainly on the work of the National Commission on Student Financial Assistance. The author worked as a senior research associate for the Commission and has reviewed all Commission research, public hearing transcripts, Commission subcommittee reports and meeting transcripts for relevant material. Information also was gathered from an extensive literature search, review of congressional testimony and an analysis of national surveys on student aid distribution sponsored by the U.S. Department of Education, higher education associations and private foundations.

This study has consolidated for the first time research findings relating to the impact of student aid policies and practices on women and emphasizes the importance of student aid for improving economic opportunity and economic security for women. Although the focus is primarily on institutional practices and student financial aid programs administered by the U.S. Department of Education (Pell Grants, Guaranteed Student Loans, College Work Study, Supplemental Educational Opportunity Grants, National Direct Student Loans, and State Student Incentive Grants), a fundamental assumption is made that federal programs and civil rights enforcement practices on student aid under Title IX of the Education Amendments of 1972 can provide a critical wedge for improving educational opportunity for women.

Given the importance of equity in achieving educational excellence, we must examine the underlying causes of inequity in student financial assistance. Only when the causes of inequity are recognized and corrected can equity in student financial assistance be achieved. This study will address the following problems: (1) examination and enforcement of Title IX requirements for achieving equity in student financial assistance has been virtually ignored; (2) student aid policies have not adapted to the enrollment trends nor economic needs of women; (3) federal student aid regulations and institutional practices have resulted in a disproportionate adverse impact on women, and particularly minority women; (4) the role of the federal government in encouraging women to participate in postsecondary education is not clarified, coordinated, nor enforced; (5) women are not represented in the federal student aid policy decisionmaking process.

TABLE OF CONTENTS

EXECUTIVE SUMMARY page

REPORT HIGHLIGHTS

I. THE STUDENT FINANCIAL AID GENDER GAP: CURRENT TRENDS AND SIGNIFICANT PROBLEMS 1

A. Impact of Education on Earning Potential. 2

B. How Women Are Meeting Educational Costs 4

C. Gender Differences in Student Aid Programs By Type of Institution . 8

D. Effects of Feminization of Poverty and Inflation on Ability to Pay for College 15

II. IMPACT OF TITLE IX LEGISLATION ON STUDENT FINANCIAL ASSISTANCE: CHANGING INSTITUTIONAL POLICIES AND PRACTICES. 15

A. Current Federal Policy Positions for Resolving Inequities in Student Financial Assistance. 16

B. Student Financial Aid and Intercollegiate Athletics 18

C. Federal Court Cases on Title IX and Student Aid. 20

D. Need for Monitoring Institutional Policies and Practices. 21

E. Guidelines for Assessing Institutional Sex Equity in Student Financial Assistance. 23

III. SIGNIFICANT DEMOGRAPHIC AND ENROLLMENT TRENDS INFLUENCING FEMALE PARTICIPATION IN STUDENT AID. 24

A. Social and Cultural Factors Influencing Female Enrollment in Postsecondary Education 24

B. Significant Enrollment Trends 25

C. Trends in Degrees Awarded to Women Since 1970 29

D. Participation of Women in Public Welfare Programs. 31

E. Participation of Women in the Work Force. 31

IV. IMPACT OF FEDERAL POLICY ON STUDENT AID FOR WOMEN 31

A. Women are Twice as Likely to Be Classified as Independent Student Aid Recipients and Have Substantial Unmet Need. 31

B. Women Are Disproportionately Affected by Student Loan Defaults and Bankruptcies. 32

C. Federal Public Assistance and College Opportunity Policies are Contradictory. 35

D. Federal Policy Needs Clarification in Calculating Child Care Expenses in Cost of Attendance. 35

E. Impact of Student Financial Assistance on Career Choice and Female Earning Potential 37

F. Part-Time Students Are Restricted From Participating in Most Federal Student Aid Programs 38

G. Federal Credit Policy on Guaranteed Loans is not Clarified nor Enforced 39

H. Lack of Federal Data Collection Relating to Impact of Federal Aid Programs on Women and Minorities.. 39

V. PARTICIPATION PATTERNS OF WOMEN IN FEDERAL STUDENT AID PROGRAMS AND REVIEW OF REGULATIONS. 40

A. An Overview of Female Participation in Federal Student Aid Programs. .40

B. Trends in Application Rates for Federal Student Aid 43

C. Regulatory Review of Federal Student Financial Aid Programs and Their Impact on Educational Opportunity for Women 44

D. Participation Patterns of Women in Title IV Programs. 45

VI. ROLE OF THE FEDERAL GOVERNMENT IN ENCOURAGING WOMEN TO PARTICIPATE IN POSTSECONDARY EDUCATION THROUGH STUDENT FINANCIAL ASSISTANCE. 66

A. Research. 67

B. Advisory Councils and Commissions. 67

C. Funding For Campus-Based Programs/Educational Excellence. 69

D. Programs for the Disadvantaged. 68

E. Information Dissemination and Technical Assistance. 68

F. Scholarships, Assistantships, Fellowships, and Stipends. 68

G. Job Training. 69

VII. PARTICIPATION OF WOMEN IN THE FEDERAL STUDENT AID POLICY DECISIONMAKING PROCESS. 70

VIII. NEXT STEPS FOR IMPROVING WOMEN'S EDUCATIONAL AND ECONOMIC OPPORTUNITY THROUGH STUDENT FINANCIAL ASSISTANCE. 74

IX. CONCLUSION. 77

APPENDICES

A. IMPACT OF POSTSECONDARY EDUCATION ON INDIVIDUAL INCOME

B. DATA REQUIRED BY U.S. OFFICE FOR CIVIL RIGHTS FOR ANALYSIS OF FINANCIAL ASSISTANCE

C. DISTRIBUTION OF TOTAL STUDENT AID BY GENDER

D. SIGNIFICANT TRENDS OF ENTERING FRESHMEN BY GENDER, 1966-1981

E. ENROLLMENT IN INSTITUTIONS OF HIGHER EDUCATION BY TYPE OF INSTITUTION AND GENDER: FALL 1979 - 1982

F. STUDENT EXPENSES AND SOURCES OF SUPPORT FOR DEPENDENT AND INDEPENDENT STUDENTS, 1981 - 1982

G. REGULATORY REVIEW OF FEDERAL STUDENT AID PROGRAMS

H. PERCENTAGE PARTICIPATION IN STUDENT AID PROGRAMS BY GENDER AND INSTITUTIONAL TYPE

I. DEPENDENT FRESHMAN PARTICIPATION PATTERNS IN FEDERAL STUDENT AID PROGRAMS

J. GUIDELINES FOR DETERMINING STUDENT FINANCIAL AID EQUITY IN LOCAL EDUCATION AGENCIES AND INSTITUTIONS OF HIGHER EDUCATION

REPORT HIGHLIGHTS

This study describes participation patterns, enrollment trends, and presents research findings relating to the impact of student financial assistance on women.

SIGNIFICANT DEMOGRAPHIC AND ENROLLMENT TRENDS OF WOMEN

- Total college enrollment for women has increased 77.4% from 1970 to 1980, compared to a 22.6% increase for men. The 1981 ratio for students of all ages is 108 women for every 100 men. Nationwide enrollment trends clearly indicate that women are very dependent on low cost institutions and programs. At public institutions, women outnumber men; at private institutions, men outnumber women (see Chapter III and Appendix E).

- Women far surpass men as part time students both in enrollment numbers as well as rates of increase. For example, from 1970 to 1980 males attending two year colleges part time increased from 275,000 to 456,000. The number of females increased from 239,000 to 713,000. Female students 35 years and over outnumber males nearly 2 to 1 (13.5 percent to 7.5 percent) (see Chapter III).

- In 1981 women accounted for 49.8 percent of the bachelor's degrees, 50.3 percent of the master's degrees, 31.1 percent of the doctoral degrees, and 26.6 percent of the first professional degrees. Women earned 4.7% of the doctorates in engineering and 9.1% of the doctorates in computer sciences. Women are most disproportionately underrepresented in the highest cost degree programs such as law, medicine, dentistry and optometry (see Chapter III).

- Women with advanced degrees beyond the bachelor's degree tend to earn twice as much per hour than women with no college. For men there is no significant difference in hourly wages between men who have advanced degrees and men who do not have college degrees. Although, within every educational level and age group women earned less per hour than comparable men. Women tend to earn 62¢ for every dollar earned by men (see Chapter I and Appendix A).

- Women are a growing proportion of the nation's poor. Two of every three adults in poverty are female and this "feminization of poverty" seriously erodes a woman's ability to pay for college (see Chapter I and Chapter IV).

PARTICIPATION PATTERNS OF WOMEN IN STUDENT FINANCIAL ASSISTANCE

- A comparison of total student financial assistance obtained by undergraduate low income students for the 1981-82 academic year indicates that women receive 68¢ for every dollar of college earnings received by men, 72¢ for every dollar received by men in total grant awards, and 84¢ for every dollar received by men in total loan amounts. The more significant differences between the sexes appear in aid programs where women have least input into how much money they will receive, that is, in grants and college earnings. Women lose out the most in non-formula based student aid and in pursuing career goals where society has not fully accepted the

participation of women, such as graduate level fellowships for engineering and corporation tuition benefit programs for top level managers (see Chapter I and Appendix C-2).

- In the Guaranteed Student Loan Program the participation rates of low income females tends to be half that of low income males. Women may be disproportionately denied loans, particualrly if they enroll in less-than-two year programs. More women may be unwilling to apply for loans when their prospects of earnings upon graduation are low. No loan forgiveness options are available (see Chapter V, Appelndix G, H, and I).

- Much attention has been focused on rising defaults and the willingness of student borrowers to repay, but little attention has been given to the critical question of ability to repay. Women are more likely to enter default and bankruptcy status because of low salaries upon graduation, higher tendency to be independent students, higher tendency to drop out of school and if they are divorced. For example, research has found that divorced women have tended to be three times as likely as divorced men to declare bankruptcy (17 percent vs. 6 percent of bankruptcies) (see Chapter IV).

- In the College Work Study Program, the participation rate for women is higher that that of men (16.5 vs. 13.8 percent of enrollments) yet the average award received is less than men ($753 vs. $830). When women do receive work-study aid, men may be getting the higher paying jobs (see Chapter V, Appendix G, H, and I). Most significant differences in college male programs have been found in academic employment.

- In the Pell Grant Program, participation rates have declined at a greater proportion for low income women than low income men (13.3% vs. 8.5%) (see Chapter V and Appendix H)

- In the Supplemental Educational Opportunity Grant Program, the only federal campus-based discretionary grant program, high achieving males tend to receive larger grants compared to high achieving females (see Chapter V and Appendix I-5).

- An analysis of regulatory policies, participation rates, percentages of total costs covered, and average awards per recipient indicate that the National Direct Student Loan (NDSL), and the State Student Incentive Grant are of particular importance to women (see Chapter V, Appendix G, H and I).

IMPACT OF FEDERAL POLICY ON STUDENT AID FOR WOMEN

- Women are twice as likely than men to be classified as independent students (66 percent vs. 34 percent), have greater unmet financial need, and tend to have higher dropout rates. Independent students attending private schools have an average unmet need of $1,447 vs. $247 for dependent students; independent students attending public schools have an average unmet need of $1,488 vs. $443 for dependent students; and independent students attending proprietary schools have an average unmet need of $2,160 vs. $1,651 for dependent students (see Chapter IV and Appendix F).

- Conflicting purposes and procedures of federal public assistance programs produce disincentives for economically disadvantaged women who seek to achieve self-sufficiency through education, particularly for women participating in Aid to Families With Dependent Children program (see Chapter IV).

- Federal policy is not clarified, explicit, or adequate in calculating child care expenses for cost of attendance (see Chapter IV).

- Part time students are restricted from participating in most student aid programs, and virtually no institution has reported using a full ten percent allowable of campus based program allocation for part time students (see Chapter IV).

- An inside look at federal decisionmaking processes in student aid within Congress, federal agencies, and student aid organizations show that women are hardly represented if they are represented at all (see Chapter IV).

IMPACT OF TITLE IX ON STUDENT FINANCIAL ASSISTANCE

- Title IX of the Education Amendments of 1972 has recognized financial aid as a major area which is particularly vulnerable to differential treatment on the basis of sex, however achieving equity in student financial assistance has been virually ignored since the passage of Title IX. An institution does not have to keep student aid information on the basis of gender under OCR guidelines for analysis of student financial assistance (see Chapter II).

- Title IX has helped improve access but not equity (see Chapter II).

- The U.S. Supreme Court has ruled that if an institution receives Pell Grants as the only form of federal aid, it "does not trigger institution-wide coverage under Title IX. In purpose and effect, BEOGS represent federal financial assistance to the College's own financial aid program, and it is that program that may properly be regulated under Title IX" (see Chapter II).

- No Memorandum of Understanding for assessing equity in student aid is in place between the Office for Civil Rights and the Office of Student Financial Assistance in the U.S. Department of Education. Such working agreements are in place with other federal programs such as bilingual education and special education (see Chapter II).

REGULATORY REVIEW OF FEDERAL STUDENT AID PROGRAMS

- All regulatory policies restricting and facilitating female participation in student aid programs have been identified by U.S.C. # (Congressional authorizing legislation) and C.F.R. # (Federal Register Location) (see Appendix G).

- A review of regulations has been based on the principle of "equity packaging" as recommended by the 1975 National Task Force on Student Aid

Problems. Based on the assumption that federal student aid is intended to increase access, choice and retention, the notion of equity packaging merely provides an equal running start for women (see Chapter V).

- The College Work Study Program has no explicit requirement relating to equal pay for equal work under the establishment of wage rates. Also, an institution may pay a graduate student it employs a salary or on an hourly wage bases, "in accordance with its usual practices" (see Appendix G).

- A written statement required from a commercial lender in establishing a loan denial for GSL so that a student may try to obtain a loan from an institution or lender of last resort, does not have to state the reason for loan denial (see Appendix G).

ROLE OF THE FEDERAL GOVERNMENT IN ENCOURAGING WOMEN TO PARTICIPATE IN POSTSECONDARY EDUCATION THROUGH STUDENT FINANCIAL ASSISTANCE

- Providing leadership in achieving educational excellence is a new dimension of the federal role in education.

- The current "Goals and Performance Priorities of the U.S. Department of Education for Fiscal Year 1984" does not include women's education equity.

- The 1983 annual report of the National Advisory Council on Women's Educational Programs has reported that 103 grants have been awarded for postsecondary education since fiscal year 1976, however, student financial assistance is not included as a subject category.

- Required federal records and reports do not include information on gender or minority status of student aid recipients.

ACKNOWLEDGEMENTS

This study would not have been possible without the encouragement, reviews, and information from many individuals representing federal agencies, banking institutions, Congressional committees, education associations, higher education institutions, and women's equity groups. I could not begin to name all of them. They know who they are - and I simply express my thanks for their valuable time spent in sharing student aid reports, doing computer runs, verifying distribution data, debating the federal role in achieving equity, returning phone calls, reviewing regulations, and commenting on drafts.

A special note of recognition and expression of appreciation goes to my friends and collegues who worked as staff, served as commissioners, and directed research studies for The National Commission on Student Financial Assistance.

TO: DAVID GARDNER

whose leadership has shown that
equity is a vital component of educational excellence

****

I. THE STUDENT FINANCIAL AID GENDER GAP:

CURRENT TRENDS AND SIGNIFICANT PROBLEMS

****

> "The twin goals of equity and high quality schooling have profound and practical meaning for our economy and society, and we cannot permit one to yield to the other either in principle or in practice"
>
> A NATION AT RISK
> The National Commission on Excellence in Education

The plight of women in obtaining financial resources for postsecondary education has been a concern of major national commissions established to study federal student aid problems, but to date, no research has been conducted on the impact of federal student aid on women. Dr. David Gardner, chairman of the Appropriate Balance Subcommittee for the National Commission on Student Financial Assistance and chairman of the National Commission on Excellence has noted:

> I worry a good deal about the differential impact of the various forms of financial aid on men as against women. For example, we all know that a pattern of enrollment on the part of men and women with respect to majors is changing, but is nevertheless different, and the capacity of women, generally speaking, to repay loans tends to be less promising than men in general.
>
> For example, over the last two, three, four years there have been significant reductions in capitation grants for all the health sciences -- medicine, pharmacy, nursing, and so forth. We have all those schools at our own institutions. . . . That immediately caused an increase both in state appropriations to make up for that and a significant increase in tuition to make up for part of it as well. So the tuition was doubled at the medical school.
>
> Now, the capacity of the undergraduate medical student to obtain credit in that fashion and to repay it subsequently is differentially greater than the capacity of those who are studying nursing, most of whom are women. And the College of Nursing also lost its capitation grant, and it's tuition was increased as well, and state appropriations were increased, in part to help defray the loss. But the capacity of those studying nursing to repay compared with the capacity of the undergraduate medical student to repay is a significant factor in the ability of students studying in those respective fields to repay. And, as we know, there is a preponderance of women in the nursing school. It does have a differential impact on the basis of sex. And my guess is that illustration is not atypical; it tends to be more typical than not.[1]

Federal legislation, particularly Title IX of the Education Amendments of 1972, has recognized that financial aid practices as presenting barriers to women's participation in postsecondary education. Although much of this federal effort has focused on institutional practices rather than federal student aid policies, our country has fallen far short of providing equal opportunity and access for women in our postsecondary institutions.[2] The developing roles of women are changing rapidly and causing one of the greatest social forces of our time. To adapt to this substantial force it is important to reexamine institutional practices in addition to identifying barriers to participation in federal and non-federal student aid programs and the impact of these policies on women as well as men. Even though formal policy prohibits sexual discrimination in the distribution of aid awards among students, the practices followed by financial aids programs may result and does result in differential treatment. As financial aid programs are designed to enhance student access to, choice of, and retention in postsecondary education, it is important to know where significant differences in the financial resources and participation patterns in aid programs of men and women exist so that the programs may compensate for them.

The National Center for Education Statistics has reported that for both men and women, lack of money is one of the greatest barriers to all types of postsecondary education. Further, it notes that "it is not merely financial need per se, but also the variables which are included and excluded in the process of developing definitions or measures of financial need, which are critical determinants of which individuals and groups may be barred from access to education for lack of financial assistance. Decisions which bar certain types of students (especially part-time students) or students in certain programs, from access to necessary financial aid, present insuperable obstacles to the continued education of some students. Women undoubtedly comprise the largest group of students whose needs are partially excluded from consideration by the present boundaries of financial aid".[3]

Results from the High School And Beyond Survey indicate that low-income women tend to receive 68¢ for every dollar of college earnings received by men, 72¢ for every dollar received by men in total grant awards, and 84¢ for every dollar received by men in total loan amounts during the 1981-82 academic year[4] (see Appendix C). Women have been confronted with significant economic burdens while participating in postsecondary education in spite of federal student aid programs designed to reduce financial barriers for a postsecondary education. Further, many enrollment patterns and economic characteristics of women are substantially different when compared with men, so as to necessitate an examination of student aid policies and practices having a disproportionate adverse impact on women. Improving economic opportunity and economic security for women is a stated federal policy goal, however, federal student aid policies as well as institutional student aid practices have not adapted to the unique needs of women and minority women, in particular.

IMPACT OF EDUCATION ON EARNING POTENTIAL

Research on the economics of education has concluded that increasing the productive and economic capacity of educated individuals is an important variable in the existence of student financial aid programs[5] and research is quite clear that the amount and kind of postsecondary education a person obtains greatly affects the employment and earnings potential of the

individual.[6] The National Center for Education Statistics (NCES) has reported that college does pay, especially for women, in a study of the relationship between years of college and economic earnings. The greater the educational attainment of an individual, the greater the employment and earnings potential. This relationship holds true for women as well as men, even though the study also noted that "however, within every educational level and age group, young women earned less per hour than comparable young men".[7] NCES also noted that after graduating from college, the wage rates of young women quickly catch up to and overtake those of their female high school classmates who do not attend college. In contrast, the wage rates of young men who did not attend college remain higher than their college-educated classmates for at least eight years after high school.(See Appendix A)

Even though the rate of inflation seems to be under control, college costs continue to soar, thus, causing many women not to achieve their full economic, educational and personal potential. Student aid, therefore, becomes a critical variable not only in assuring that women are guaranteed access to a postsecondary education but also that they may become more economically self sufficient. The National Commission on Student Financial Assistance has emphasized that student aid also plays an important role in creating an environment of greater educational expectations and goals and the availability of student aid helps promote the benefits of a higher education and a national policy encouraging college attendance.[8]

National statistics as well as several commissions have recognized the substantial return on investing in education for all groups of individuals. The National Commission on Excellence in Education has declared that "learning is the indispensable investment required for success in the 'information age' we are entering"[9] and the Carnegie Commission on Higher Education has recognized the following dimensions of persuing education:

> Benefits take many forms. Some are individual and accrue to the direct recipients of education; among other advantages are a higher income, a more satisfying job, greater effectiveness as a consumer, greater ability in allocating time as well as money, direct enjoyment of the educational process and its related activities, and lifetime enhancement of cultural and other experiences. Some benefits are social and accrue to nonrecipients as well as to direct recipients of education; among the gains are greater economic growth based on the general advancement of knowledge and elevation of skills and on the higher proportion of the population in the labor force and the enhanced mobility of members of the labor force and the enhanced mobility of members of the labor force; greater political effectiveness of a democratic society based on the more adequate knowledge and more active participation of citizens; greater social effectiveness of society through the resultant better understanding and mutual tolerance among individuals and groups; the more effective preservation and extension of the cultural heritage; the greater ability of individuals and groups to accept and adjust to rapid change; and the greater potential contribution of educated parents to the welfare of their children.[10]

Education is therefore a vital key to economic opportunity for women. The National Employment Report of The New York Times stated that "highly educated and professional women have indeed taken giant strides in the last decade. It is no longer remarkable to find women serving as elected officials in municipal, state and national government or working as lawyers, judges, physicians, research scientists, bankers and corporate executives".[11]

HOW WOMEN ARE MEETING EDUCATIONAL COSTS

Female college students have higher enrollments in the early years of undergraduate school, have greater financial need for student aid, yet the financial resources they receive in combined grants, loans and earnings is far less than that of men. It is critical for officials to look beyond female participation rates in federal and non-federal student aid programs and pay particular attention to the actual dollars women receive in grants, loans and college earning programs as well as to regulatory policies having a disproportionate adverse impact on women.

An analysis of total average grants, loans, and college earnings received by both men and women indicate that the most significant gender differences appear in aid programs where women have least input into how much money they will receive. When total amounts of student aid received are examined, the widest disparities appear in grants and college earning amounts (see Appendix C). Gender differences are not readily apparant in loan programs, until one investigates the disproportionately low participation rate among low-income females and the disproportionate adverse impact of defaults and bankruptcies on women. Further, the gender gap in student aid becomes progressively acute as more discretion enters into the award decision. Thus, women lose out the most in non-formula based student aid and in pursuing career goals where society has not fully accepted the participation of women, such as graduate level fellowships for engineering and corporation tuition benefit programs for top level managers.

Trends in Expected Family Contributions: Parent and Spouse Support

The Expected Family Contribution is the foundation upon which almost all federal and non-federal student aid is awarded, and the EFC represents an estimate of the amount that a student and his or her family can pay toward the cost of postsecondary education. Noticeable gender differences may be found in an examination of parental and spouse support for education.

Parents of women have been found to contribute more than expected in relation to amounts contributed by parents of men. It has been suggested that parents contribute more because they have to and it does not appear that parents of women contribute more because of a greater ability to make contributions. Research by Jerry Davis of the Pennsylvania Higher Education Assistance Agency, utilizing data from statewide Student Resource Survey (SRS) studies of education costs and resources of full-time undergraduates in three states, has found that many sex differences in the paterns of financial resources available to pay for college costs exist. Findings based on a sampling of almost 29,000 undergraduates in 241 colleges and universities noted that there are significant sex-related differences in total resources available to pay college costs, in the amounts and percentages derived from different sources, and in the way financial aid is distributed among students.[12]

College freshmen have been found to rely on parental aid far more than any other single source. The Higher Education Research Institute in Los Angeles has concluded that for nearly 65 percent of the women, parental aid is a major source of support vs. 47 percent for men. Figures were not available for black women, except that for total blacks, black students are somewhat less likely than whites to rely on parental aid: only 33 percent depend on parental aid for major freshman support.

Financial support from spouses has been found to be especially important for married women, not only in terms of actual dollars provided, but also major spouse support can be a crucial variable for women to persist and complete college.[13] Women in particular, who are married depend heavily on their spouses for financial support. In a study on financial aid and student persistence, Alexander Astin of the Higher Education Research Institute found that both men and women substantially improve their chances of finishing college if they are able to rely on their spouses for financial support. Even minor (compared with no) support is also beneficial. However, the unwillingness or inability of the spouse to provide financial support has been found to substantially decrease the probability of a married student to earn a degree. Astin has further stated that "On a more subtle level, spouses who are ambivalent or resentful about their partner's attending college may provide only sporadic or little support. Whatever the explanation, providing only minor support may create uncertainties or conflicts that militate against completing college. If nothing else, married students might be well advised to reach a clear understanding about financial support from their spouses before they finalize plans to enroll in college."[14]

Trends in Corporate Student Assistance for Employees

A characteristic pattern for men enrolled in graduate programs is having to work and then having their courses partially or totally paid for by their employer. Characteristically, that is not happening to women. The National Institute of Education has found that many types of tuition aid plans are emerging as fringe benefits on the part of employers, yet women are the lowest users of these benefits.[15] The 1983 Condition of Education has reported the following significant patterns of female participation in adult education and corporation tuition benefit programs;

- Sixty percent of adult education courses are taken to advance in a job, to get a new job, or for some other job related reason. Men participate in these courses 69 percent compared with 54 percent for women.

- Employers provided nearly a fourth of all courses. Nearly half of the adult education courses taken at postsecondary institutions were paid for solely by the participant or family - 39 percent of the courses taken by men and 54 percent by women. The remaining courses were paid for through other sources such as government funds or business/industry. Employers were one source of funding, if full or part, for 41 percent of the courses taken by men and 26 percent of those taken by women.

- Men reported paying an average of $165 per adult education course, while women reported paying an average of $95.[16]

Education is provided by companies primarily as a means toward upgrading, promotions and improving job skills. While many of the barriers to use of tuition aid are shared by men and women, other obstacles limit women's use of tuition aid in particular. Low job status, limited job opportunities, as well as costs, lack of time, fatigue, tuition aid program regulations and attitudes toward the benefits of additional education all restrict use of tuition aid by men and women alike. Nonetheless, women's positions at the bottom of the job and income ladders, the effect of sex-role learning on ocupational expectations and the impact of home responsibilities on their free time contribute to women's even lower tuition aid utilization and justifies particular emphasis on improving their participation.

As reauthorization for the Higher Education Act takes place it may be beneficial to reconsider such programs such as the "Women's Worksite Development Demonstration Program" which was proposed during the reauthorization process for the Education Amendments of 1980, but was not approved. The intention of this program was that the Secretary of Education would "make grants to and enter into contracts with, eligible recipients to promote, plan, implement, and evaluate the delivery of postsecondary education to women at the place of their employment or in conjunction with their employment".[17] The Secretary would assure that the program would: (1) Identify the most effective means to inform women at the place of their employment and through the aegis of their employment of the availability and relevance of postsecondary education, and (2) Test the most effective means for creating collaborative agreements among institutions of higher education, including community colleges, employers and labor organizations to deliver educational services.

Trends in Graduate School Assistantships and Fellowships

Unlike undergraduate students, graduate and professional students are not eligible to receive Pell Grants, Supplemental Education Opportunity Grants, State Student Incentive Grants or many other state and private sector grants. Thus, the competition for deminishing graduate assistantships and fellowships becomes very acute and women lose out. The National Commission on Student Financial Assistance has concluded that there are continued obstacles to the progress of women in research and has found that the depressed state of the academic job market combined with demographic change, rapidly escalating costs, and reduced financial aid has discouraged outstanding students, the traditional backbone of enrollments in graduate programs, from continuing their studies in the arts and sciences. The grim situation of low participation and lack of economic supports appears to be the rule of thumb for women.

The Graduate Education Subcommittee of the Commission chaired by John Brademus, President of New York University, has reported that "men in general receive somewhat more financial assistance from the federal government and universities than women, while women have a somewhat greater reliance on self-support. . . . The most significant disparity between men and women is

in the availability of work-related assistantships".[17] The Commission further found that programs targeted to women graduate students are few in number and small in size and that federal reductions in graduate student support have coincided with dramatic increases in tuition. The federal program of particular concern is the Graduate and Professional Opportunities Program (GPOP) for women and minority students, currently supporting approximately 200 women graduate students per year.

At the graduate level, the distribution of assistantships, fellowships and other awards are characterized by a very decentralized pattern with individual departments having great autonomy. Most of these awards are not available through or monitored by an institution's student financial aid office. Graduate awards are generally dispersed by department chairmen. Further, substantial differences exist among various schools within any single university. The National Women's Law Center reports that "if a department is controlled by faculty who believe women have no place in the discipline or profession, distribution of graduate financial aid may well reflect that bias. Expectations that women will leave the workforce for periods of childbearing or childrearing may also influence the distribution of graduate fellowships or other aid, to the detriment of women who wish to pursue graduate studies".[18]

There is also a disproportionate balance of men holding significantly more research assistantships, as opposed to teaching assistantships, than women particularly in environmental sciences and computer sciences which are fast growing fields. Research assistantships are primarily federally funded. Information presented during public hearings of the National Commission on Student Financial Assistance has noted:

> A research assistantship contributes to the quality of graduate education. It serves to integrate the student into the profession. It serves to teach him or her the sort of nontechnical elements of the profession. You learn how the grant mechanisms work. You learn what's at the forefront of the field and what isn't. You become in the Sciences, in a very important way, integrated into the research group, which no other form of support provides. So we see rather gradually, insidiously differentiation taking place where women are expected to do a disproportionately higher share of undergraduate teaching which takes them away from the company of their colleagues and faculty and puts them into a different environment with young students. Whereas the male students predominantly are working with faculty are regarded as colleagues, derive some other benefits from that. They are likely to have more opportunities to publish before they actually finish their Ph.D.'s. They are likely to have subsidized travel, attend meetings, have opportunities to be introduced to people in other institutions.[19]

The real financial problems, however, are not seen in the data collected from graduate students because minority women and independent women with children, in particular, who have limited resources do not even think of applying for graduate school. Also, major national research projects designed to assess needs,[20] and student aid packaging practices[21] for students enrolled in graduate schools have ignored the gender differences. The National Commission on Student Financial Assistance has recommended that

in the area of graduate education for women, particular attention should be paid to (1) the possibility that women's loan burdens may be proportionately greater because their anticipated lifetime earnings are smaller; (2) cultural factors that discourage many women from considering careers in science and engineering; and (3) biases in favor of men in the awarding of fellowships and research assistantships.[22]

GENDER DIFFERENCES IN STUDENT AID PROGRAMS BY TYPE OF INSTITUTION

Noticeable gender differences have been found in both cost of attendance and the distribution of student aid at public, independent and proprietary institutions. During the past year major studies of student financial aid recipients have been conducted obtainining data from individual student records. Earlier reports relied on institutional aggregate data providing little information on what types of students received what types of student aid. Tabulations from the High School and Beyond Survey, conducted by the U.S. Department of Education, indicate that females nearly always receive smaller dollar awards in all categories of student assistance - that is, in grants, loans and college earnings.

A close look at survey results from the High School and Beyond Study indicate noticeable trends by which low-income females are meeting college expenses as cost of attendance is increasing and federal funding is decreasing (See Appendix B and G). The following observations are based on available date for the 1980-81 and 1981-82 academic years for all tuition levels, all types of institutions and low family income levels :

- Total average grant awards decreased for female recipients ($1688 to $1609) and increased for male recipients ($1950 to $2218). For 1981 - 82 women tend to receive 72¢ for every grant dollar awarded to men.

- The female participation rate in the Pell Grant Program dropped at a greater proportion than men. Low-income female participation in the Pell Grant program decreased from 61.8% to 48.5% (13.3%) and low-income male participation decreased from 54.1% to 46.4% (7.7%).

- As participation rates decrease for total grants and all federal aid programs, except GSL, all students increase rates of participation in loan programs and non-federal work programs. Low income women increased participation in all loan programs (28.5% to 33.6%), increased participation in GSL (4.4% to 15.2%), but decreased participation in the National Direct Student Loan Program (16.3% to 8.9%). For 1981 - 82 undergraduate women tend to receive 84¢ for every loan dollar received by men.

- Participation rates in non-federal work programs increased for both males (55.9% to 59.8%) and females (50.6% to 58.6%), but decreased for the College Work Study Program (13.5% to 9.3% for females and 10.8% to 6.4% for males). However, the proportion of total average college earnings received by females decreased. (72¢ to 68¢ for every dollar earned by male students)

Public Institutions

The strive to maintain low tuitions among land-grant colleges, state colleges and universities, and community colleges has resulted in one of the best mechanisms to achieve educational equity and opportunity for women. An examination of enrollment trends issued by NCES clearly indicates that women are very dependent on low cost institutions and programs with 5,063,199 female students attending public institutions compared to 1,331,197 female students attending private institutions for school year 1982-83. At public institutions females far outnumber males; at private institutions males outnumber females (see Appendix E). However, there is now widespread concern that many individuals are increasingly being kept out of public institutions because of student charges, especially tuition; and that a major effort is needed to help reverse the trend toward higher student charges and reduced equal educational opportunity.[22]

Women have been found to have a vital stake in low tuition for the following reasons: (1) A much smaller percentage of qualified women than men attend college, (2) Women from low-income and minority families have less chance for college, (3) Women get less student financial aid than men, (4) Women in college have fewer work-study opportunities, (5) Part-time and older women as well as men are discriminated against, (6) Older women have much lower incomes than men and connot affort high college costs, (7) Long-term loan plans discriminate against women even more than men.[23]

A 1983 study by Jacob Stampen on public higher education student aid recipients for academic year 1981-82 found that total student aid resources were less for women than men, even though the average total cost of attendance was higher for independent females (See Table 1). Tuition for both dependent and independent females tends to be less than males. This survey, sponsored by the American Association of Community and Junior Colleges, The American Association of State Colleges and Universities and the National Association of State Universities and Land Grant Colleges, involved 2 6 public colleges and universities and approximately 12,000 stude aid recipient records for the academic year 1981 - 82. The study four that over half - 55 percent - of all need-based recipients were women and that most student aid going to public college students was federal aid. Federal aid accounted for roughly eight out of ten grant dollars, more than nine out of ten loan dollars, and three out of four work study dollars.[23]

Results from the High School and Beyond Survey indicate that at public 4 -year institutions low income females received an average grant award of $1448 compared to $2,034 for low income males for school year 1981 - 82. This average was actually a decrease for women from the previous year while for men this average was an increase. Women also received much less than men in total average loan amounts and total average earning amounts for both years and at both public 2 year and 4 year institutions. (See Appendix C)

Table 1

DISTRIBUTION OF STUDENT AID BY GENDER AT PUBLIC INSTITUTIONS

Cost/Aid	Dependent Male	Dependent Female	Independent Male	Independent Female
Cost				
Tuition	$ 976	$ 894	$ 777	$ 700
Total Expenses	3,935	3,784	5,866	6,232
Aid				
Grants	1,147	1,120	1,373	1,236
Loans	816	684	961	712
Work	286	349	390	345
Other	163	121	258	228
Total Resources	2,412	2,274	2,982	2,521

Source: Jacob Stampen, Student Aid and Public Higher Education: A Progress Report. Washington, D. C.: The American Association of Community and Junior Colleges, The American Association of State Colleges and Universities, and The National Association of State Universities and Land Grant Colleges. January, 1983.

Proprietary Institutions

Much of the proprietary sector focuses on preparing disadvantaged youths with the job skills that are necessary for successful participation in the work force.[24] These schools consist of large numbers of cosmetology, and business/office training cetners, thus enrolling a substantial number of women. Further, the National Commission on Student Financial Assistance found that 54 percent of the student aid recipients are classified as independent students and this sector has the largest percentage of unmet need, compared to student aid recipients at public and private institutions.

At proprietary schools, students' sex differs widely with their occupational program, which largely reflects the sexual composition of the larger occupation. Because students in this sector rely most heavily on loans (26 percent) and are found to have the greatest unmet need (30 percent), women are most likely not to enroll or drop out. A national survey of student aid recipients at proprietary institutions for 1981 - 82, directed by Wellford Wilms at the University of California at Los Angeles, found that the average cost of attending a

proprietary school is $5,584. To meet this cost, the average student financial aid package consists of 9% - expected parental contribution, 8% expected student contribution, 2% - employment, 26% - loans, 22% - grants, 4% - other aid and 30% unmet need.[25]

Tabulations from High School and Beyond Survey indicate that greater gender gaps occur in the category of grants for the proprietary sector. Wilms has noted that between 1973 and 1980 proprietary students' share of the NDSL increased from two to eight percent of the programs, but the average award fell from $1,332 to $674. Reasons for this shift away from NDSL represents an increased reliance on GSL and partly represents a substitution of grants for loans as the grant program grew and the Middle Income Student Assistance Act increased student eligibility. The NDSL programs has been found to be one of the most beneficial student aid programs for women.

Federal student aid has accounted in large measure for the growth of the proprietary school industry and as long as student aid comprises a significant share of students' tuition, federal policies will likely exert a powerful effect on schools' behavior. The four accrediting groups for proprietary institutions include the National Home Study Council, National Association of Trade and Technical Schools, Association of Independent Colleges and Schools, and the Cosmetology Accrediting Commission. There is growing evidence that programs in proprietary schools are shaped to the changing labor market needs, and research has indicated that students' demands for training are indeed related to prevailing wages and unemployment rates.

As of 1980, the proprietary industry was the largest school provider of postsecondary vocational training. The 5,993 residential and 82 correspondence schools made up nearly two-thirds (64 percent) of all postsecondary schools offering vocational education. Figures from the U.S. Department of Education and The National Commission on Student Financial Assistance seem to indicate that the greatest sex differences ~~in total aid~~ occur in the proprietary/vocational sector. Wilms has noted that "because proprietaries are businesses first and schools second, their ways of cost cutting, increasing market shares and revenues, and minimizing risks are often misunderstood by educators and policymakers or interpreted as marks of low-quality education[26]

Private Institutions

The rate of increase for student aid recipients at private institutions is more than double for women than for men, yet average student aid awards for women attending private institutions is substantially less that that of men. Between fall 1979 to fall 1981 total female student aid recipients at private schools increased 9.1% (from 45.4% to 54.5%) and total male student aid recipients increased 4.3% (from 47.8% to 52.1%). The National Center for Education Statistics reported that the total average grant award between 1980-81 and 1981-82 for males attending private 4-yr. schools increased from $3323 to $3613 while the total average grant award for females increased from $3022 to $3081. Total average loan amounts for males increased

from $1871 to $2228 and for females increased from $1352 to $1871. Total average earnings for males increased from $884 to $1158 and for females increased from $671 to $927. (See Appendix C)

A 1981 - 82 study conducted by the National Institute of Independent Colleges and Universities (NIICU) of student aid records from a national sample of aid recipients attending independent colleges and universities concluded that "recent reductions in federal student assistance and restrictions placed on program eligibility reduced substantially the number and proportion of low-income students". Specific findings related to participation in major federal aid programs which have a greater adverse impact on women included: (1) There was a decline of almost 18 percent in the amount of Pell Grant funding between 1979-80 and 1981-82 to students attending independent colleges and universities, and almost a 10 percent decrease in the number of Pell Grant recipients and (2) The use of Guaranteed Student Loans increased dramatically. The number of students participating in this program during the two-year period doubled, and the average GSL has increased by 27 percent, from $1,787 in 1979-80 to $2,264 in 1981-82. (Major restrictions in GSL were enacted after the survey period.)[27]

Further research on access at private institutions found that when adjusted for inflation, the drop in the buying power of Pell Grants declined by fully one third between fall 1979 and fall 1981.[28] Also, recent proposals to shrink or eliminate student financial aid programs, and the methods by which Congress has made reductions, disproportionately affect low-income students attending moderately or higher-priced institutions. The severity of this situation, which may have a particularly disproportionate impact on female students, has not received attention.

Congressional testimony before the House Subcommittee on Postsecondary Education presented the following information pertaining to student aid recipients attending private schools, having implications for female students: (1) From 1979 - 80 to 1981 - 82, independent higher education experiences a 39 percent decrease of student aid recipients from families with annual incomes in the range between $6,000 and $24,000, (2) Students rely more heavily on need-based aid offered by the private institutions themselves. Overall, the percentage of aid recipients receiving institutional aid climbed from 45 to 55 percent, and the average institutional award increased to almost $1,500 per student, (3) Students rely more heavily on Guaranteed Student Loans, and the concomitant debt burden which that involves. The number of independent college and university students participating in the GSL program doubled between 1979 - 80 and 1981 - 82, and average GSL borrowing climbed from $1780 to $2,264, (4) Studies of student financial aid reveal that the loss of low-income students correspond with a sharp decline of minority participation, and (5) Needy student aid recipients are working more, assuming more debt burden, and exacting more help from their parents.[29]

EFFECTS OF FEMINIZATION OF POVERTY AND INFLATION ON ABILITY TO PAY FOR COLLEGE

Women are a growing proportion of the nation's poor, and this trend has been found to be a demographic fact over the past two decades. Two of every three adults in poverty are female and this "feminization of poverty" seriously erodes a woman's ability to pay for college. Analysis of the labor market and women's sociometric status demonstrates that the feminization of poverty is not just the concern of low-income women. Females on nearly every economic and educational level are affected. The U.S. Department of Labor reports that women currently earn 62¢ for every dollar of earnings men receive. Further, the participation of women in public assistance programs is growing at staggering rates and Margaret Heckler, U.S. Secretary of Health and Human Services has declared the feminization of poverty to be a national problem. The American Association of University Women has recognized the following causes of feminization of poverty: (1) Women in the labor market frequently have less education, training, or work experience than their male counterparts; (2) Women are discriminated against in hiring, promotions and salary; (3) Sex segregation in the labor market, known as occupational segregation, channels women into lower paying jobs; and (4) Female heads-of-household frequently must support children and pay for child care with little or no assistance.[30]

Economic shifts, particularly, have eroded the educational purchasing power of federal student aid programs. In an extensive study on trends in student aid from 1963 to 1983, the College Board has concluded that "a realistic portrayal of trends in student aid must allow for inflation, which has greatly eroded the purchasing power of the dollar over the past twenty years. . . .Between 1980-81 and 1983-84, the real value of aid dropped an estimated 21 percent.[30] Evidence from research and public hearings have shown that student costs are most vulnerable to economic shifts. Research findings presented to The National Commission on Student Financial Assistance indicate that the effects of inflation have had an adverse impact on women's ability to pay for college. The Commission has found that: (1) Inflation over the decade from 1972 to 1982 seriously eroded the ability of all families to pay for college, (2) Inflation was decreasing the resources to pay for college faster than student aid was increasing them, such that (3) Inflation virtually eliminated the increase in the resources to pay for college that the Congress intended to provide through the student aid programs.[31]

Carol Frances, an economist specializing in education with the international accounting firm of Coopers and Lybrand in Washington, D. C. noted the following conclusions about trends, having implications for women, in the ability to pay for college:

- Because the inflationary increases in the cost of living have exceeded the growth of money income since the early 1970s, the real purchasing power of family income in the United States has actually decreased.

- Inflation combined with recession in recent years has led to greater inequality in the distribution of family income, as measured in constatnt 1981 dollars. . . . The number of low income families

that needed to be helped by the student aid programs in sending their children to college actually increased over the last ten years. From 1973 - the year in which there were the fewest number below the poverty line - to 1981, the number of poor families increased by over 12.0 million or over 40 percent.

- The appropriate measure of the ability to pay for college is not total income but discretionary income, that is, the income available after taxes and after spending for essentials. Tuition as a share of discretionary income has increased drastically. Tuition is estimated to have risen from under one-third to over two-thirds of discretionary income over the last decade. This would indicate that there has been a substantial increase in the pressure experienced by families in paying for college.

- The preliminary analysis of college-going rates by race indicate that the rate for lower-income blacks is going down while the rate for lower-income whites is going up. The observed differences might raise questions about the differential impact of student aid.

- While the aggregate amount of student aid appropriated appears to have increased substantially from 1972 to 1982, the amount of the average award has not increased as fast as the tuition paid by each student. Consequently, inflation wiped out almost all of the dollar value of student aid awarded and left students, particularly those students without aid, with increasing difficulties in paying for college.

- Inflation and high interest rates have drawn a substantially increasing share of student aid dollars away from investment in the actual educational process to pay for staggering increases in the cost to students of borrowing to finance their education.[32]

Participation of women in the Student Aid Policy Decision-making Process

II. IMPACT OF TITLE IX LEGISLATION ON STUDENT FINANCIAL ASSISTANCE: CHANGING INSTITUTIONAL POLICIES AND PRACTICES

In a landmark women's equity decision, the U.S. Supreme Court has ruled in Grove City vs. Bell that the receipt of Pell Grants (BEOGs), a federal grant program designed to address a national need of enabling financially disadvantaged students to attend postsecondary institutions, "does not trigger institution-wide coverage under Title IX. In purpose and effect, BEOGs represent federal financial assistance to the College's own financial aid program, and it is that program that may properly be regulated under Title IX."[1] This decision has sparked the most significant challenge, opportunity and test of political and educational leadership of individuals and groups concerned about women's equity, particularly in the area of student financial assistance. The Supreme Court has inadvertently forced federal officials and university administrators to examine standards and expectations in helping women to finance a postsecondary education, an equity policy issue which has virtually been ignored.

Title IX of the Education Amendments of 1972 was passed by Congress to eliminate discrimination on the basis of gender in most education programs and activities receiving Federal financial assistance. Regulations implementing this legislation have rightly recognized financial aid as one area which is particularly vulnerable to differential treatment on the basis of sex by requiring that postsecondary institutions providing financial assistance to any of its students may not provide different amounts or types of assistance, limit eligibility for assistance, apply different criteria, or otherwize discriminate on the basis of sex. Further, an institution's application for federal funds must be accompanied by an assurance statement indicating that financial aid activities will be administered in compliance with Title IX regulations. However, federal enforcement practices by the U.S. Office for Civil Rights do not include student financial assistance as a category for compliance reviews,[2] and no Title IX court decisions have been made on financial aid issues from the perspective of equitable distribution of dollars.[3] It is somewhat ironic that substantial legal debate has occurred before federal judges to decide whether or not Pell Grants, in particular, are to be considered as federal assistance to an institution, thus requiring an institution to comply with Title IX.

The Guaranteed Student Loan Program and the Pell Grant Program have become political and legal scapegoats in deciding whether postsecondary institutions have to submit Title IX assurances when the institution does not receive any direct federal funding, but only their students receive student assistance. What seemingly has grown out of a resistance on the part of small private, religious-affiliated institutions to comply with key federal civil rights laws,[4] has blown into a full scale U.S. Supreme Court case (Grove City vs. Bell) in which the final decision will have substantial impact not only as to whether or not women will be allowed to make progress in the area of education equity, but whether private schools, in particular, can continue to engage in discriminatory practices against women and minority groups.

To date, institutions have not been held accountable for equitable distribution of scholarships, graduate fellowships, state grants or any other form of student assistance. Much of the problem lies not only in the lack of Title IX enforcement, but also the distribution of student aid within institutions is characterized by very decentralized patterns, no availability of student aid reports detailing the distribution of student aid by gender, and financial aid offices usually receive student and family financial information with a promise to maintain confidentiality. Many students also view the matter of financial aid as a personal issue and are reluctant to discuss the nature of their aid package with others. As a result, few students or administrators are aware either of the way other students in similar financial circumstances are treated, or the way male and female students fare as distinct groups. Federal judges have also been found to perceive Title IX cases as frivolous and are looking for ways to clear their overloaded dockets and therefore refuse to hear Title IX cases.[5]

For education equity issues other than student financial assistance, such as admissions, intercollegiate athletics, dress and appearance codes, sexual harassment and student activities, Title IX has actually marked an era of tremendous progress in accomplishing the first step in a long road to achieving educational opportunity for women. Title IX also reflects the social revolution taking place throughout the country, in which substantial changes in attitudes are taking place among both men and women regarding the provision of equity. This federal legislation has been quite successful in launching the first major initiative in prohibiting sex discrimination and thus has enabled women to make substantial strides in pursuing higher degrees, particularly in non-traditional programs such as science, engineering, law and medicine. In fact, Title IX has done more to increase the participation of women in postsecondary institutions than have federal student aid programs. This is especially true for increasing female awards in athletic scholarships even though Title IX has merely achieved access and not equity. It is no longer news that women are obtaining athletic scholarships or that women are allowed to enroll in prestigious law schools, schools of medicine or engineering. The question that is of concern now is whether women are able to pay for higher education in order that they can increase their chances of earning higher incomes and entering the job market with salaries of comparable worth.

CURRENT FEDERAL POLICY POSITIONS FOR RESOLVING INEQUITIES IN STUDENT FINANCIAL ASSISTANCE

Current actions by the U.S. Education Department and the U.S. Department of Justice in defining the program or institutional nature of student aid have been found to be unpredictable.[6] The Office for Civil Rights has been inconsistent in claiming that school programs are covered by Title IX when enrolled students receive federal student aid, even though the institution may not get federal dollars directly. Also, the Department of Justice is arguing that all programs come under the jurisdiction of Title VI of the 1964 Civil Rights Act and charges of sex discrimination can be filed under this act.[7] However, the The 1978 NationalAdvisory Council on on Women's Educational Programs has pointed out substantial differences between Title IX and Title VI:

> It is instructive, however, to compare the scope of Title IX's coverage with that of Title VI of the 1964 Civil Rights

Act. The latter act prohibits discrimination on the basis of race, color or national origin in all programs and activities receiving Federal financial assistance. Title VI has not been amended by Congress to include sex discrimination, partly because of fears that a serious attempt to amend Title VI would result in weakening amendments by conservatives. Thus, an alternative course of action has been pursued: specific anti-sex discrimination provisions have been added to various grant authorization statutes as they have come up for renewal. The result is a patch-work quilt of laws prohibiting sex discrimination in some, but not all, grant programs. Much of the language of Title IX is modeled after that of Title VI. For example, the sections on the responsibilities of Federal agencies to enforce the law and the sanctions for noncompliance are identical. If a grantee does not comply with the law, the Federal agency may delay awards of money, revoke current awards or debar institutions from eligibility for future awards, or ask the Justice Department to bring suit. There are other differences between Title IX and Title VI. Title IX as interpreted by HEW covers employment in education programs and activities. Title VI covers employment only where the primary objective of the Federal financial assistance is to provide employment, or where discriminatory employment practices affect beneficiaries of the assisted program.[8]

The Office for Civil Rights is charged with the responsibilities of resolving inequities in student financial assistance by performing the following functions:

(1) • Conducts investigations and negotiations to secure voluntary compliance; evaluates and accepts or rejects corrective action plans; determines whether voluntary compliance can be secured; and conducts administrative enforcement proceedings to secure compliance.

(2) • Recommends, in conjunction with the ED General Counsel, that cases be referred to the Department of Justice for judicial enforcement.

(3) • Develops and recommends regulations and policies of general applicability in the area of civil rights.

(4) • Conducts a program of civil rights technical assistance and assists other Department offices in developing and implementing plans to meet civil rights objectives.

(5) • Coordinates information gathering and collects data needed to ensure compliance with Department policies on civil rights.[9]

The Department of Justice is empowered to oversee the development, coordination and implementation of consistent and effective enforcement regulations, policies and procedures.

A major operating policy of the federal government is that of "voluntary compliance". This policy has resulted in a 47 percent decline in total complaint receipts between fiscal year 1980 and fiscal year 1982.[10] In order to voluntarily resolve complaints, the Office for Civil Rights has adopted an Early Complaint Resolution (ECR) process which is employed prior to the beginning of an investigation. In this process, OCR serves as a neutral mediator and assists complainants and institution representatives in resolving the issues raised in complaints. This eliminates the need for an OCR investigation.

Regulatory reform has been another policy objective for the implementation of Title IX. OCR has stated that the intent of this policy has been to "reduce the burden of the existing and proposed regulations on recipients without compromising the rights of participants in and beneficiaries of the recipients' programs, and to ensure that those regulations are clearly within the authority delegated by law and are consistent with congressional intent".[11]

The most recent annual report of the Office of Civil Rights indicates that complaint receipts under Title IX decreased from 347 in 1981 to 185 in 1982 while the number of Title IX complaint closures decreased from 474 in 1981 to 318 in 1982. Compliance reviews are reported for many postsecondary issues including program accessibility, graduate and professional school admissions, intercollegiate athletics, and higher education desegregation; however, no compliance reviews are reported for student financial assistance.[12]

STUDENT FINANCIAL AID AND INTERCOLLEGIATE ATHLETICS

Much of the controversy surrounding Title IX regulations has been in intercollegiate athletics, an area of alleged sex discrimination in higher education as well as the area which provides the largest amounts of student financial assistance. Where men are afforded opportunities for athletic scholarships, women must also be provided similar opportunities. Specifically, the regulations provide that "To the extent that a recipient (institution) awards athletic scholarships or grants-in-aid, it must provide reasonable opportunities for such awards for members of each sex in proportion to the number of students of each sex participating in interscholastic or intercollegiate athletics".[13]

The Office for Civil Rights has issued a policy interpretation to clarify the obligations that recipients of federal aid have under Title IX to provide equal opportunities in athletic programs:

> The Department will examine compliance with this provision of the regulation primarily by means of a financial comparison to determine whether proportionately equal amounts of financial assistance (scholarship aid) are available to men's and women's athletics programs. The Department will measure compliance with this standard by dividing the amounts of aid available for members of each sex by the numbers of male or female participants in the athletics program and comparing results. Institutions may be found in compliance if this comparison results in substantially equal amounts or if a resulting

> disparity can be explained by adjustments to take into account legitimate, nondiscriminatory factors.. . . .This policy interpretation applies to any public or private institution, person or other entity that operates an educational program or activity which receives or benefits from financial assistance authorized or extended under a law administered by the Department, i.e. such institutions are 'recipients'. Educational institutions whose students participate in ED funded or guaranteed student loans or assistance programs are 'recipients'.[14]

An American Council on Education study on financing collegiate athletics clearly points out the underlying problems pertaining to student financial assistance and providing equity for women:

- Intercollegiate athletics is an area of university operations that tends to be shrouded in secrecy.
- Providing equal opportunity for women on a semiprofessional intercollegiate expenditure level would lead to financial disaster for higher education institutions with semipro programs.
- Subsidized athletes, particularly in football and basketball, usually have "full rides," meaning that all tuition, room and board, and living expenses (subject to the differing rules of NCAA and AIAW) are paid by the athletics program.
- Financial aid is so expensive. . .that relatively few institutions use their full quota of awards and many institutions severely restrict the award per student, providing only partial support, to athletes skilled in sports that do not produce revenue.
- The pressure is considerable on college and university chief executive officers in institutions to produce winning teams.
- In the NCAA Division I institutions, the typical women's program depends somewhat on the financial success of men's football for budgetary support, although most of the funds for women's programs come from institutional sources rather than gate receipts.
- Academic scholarships are seldom as numerous or as generous as athletics grants-in aid.
- Even though women are only 30 percent of the total athletics population, equalization costs will be so high that institutions will experience a significant budgetary strain, especially private institutitons with high tuition costs.
- Semipro institutions often provide lucrative and sometimes undemanding summer jobs to recruits as a way to get the edge on the competition. National rules and enforcement regarding such jobs may be somewhat looser than enforcement of rules on academic year support.

- Men's athletics programs have adopted more cost-control measures since the passage of Title IX than in any other previous period in history of men's athletics. Equal opportunity for female athletes might very well turn out to be the long-needed catalyst for controlling the cost of intercollegiate athletics.[15]

FEDERAL COURT CASES ON TITLE IX AND STUDENT AID

A recent flury of court cases has caused controversy, confusion and heated Congressional debate as to the scope of Title IX regulations. At the center of the debate is whether or not federal student aid programs constitute direct federal assistance to institutions. The underlying legal question is whether or not student financial assistance is intended to be treated as direct aid to a college or indirect aid because it is received by the student. In Grove City vs. Bell the plaintiff contended that its athletic program did not have to comply with Title IX because the program does not receive any direct federal assistance, even though their students received Pell Grants. It is important to note that the program in question is that of college athletics, in which tuition and room and board scholarships are the major support for college athletes. It is also important to take note that no court cases have come about in which plaintiffs have sued for equal student aid. The costs of bringing about such a law suit would generally far surpass any amount awarded by judge or jury.

In Grove City vs. Bell a Christian college in Grove City, Pennsylvania which received no federal or state financial assistance other than federal aid to its students and four students filed suit seeking an order to declare void the Department of Education's termination of students' financial assistance based on the institution's failure to comply with Title IX of the Eduction Amenments of 1972. Approximately 2,200 students attend Grove, in which one hundred forty of Grove's students are eligible to receive Pell Grants, and 342 students have obtained GSLs. Other than through Pell Grants or GSLs, Grove receives no federal or state financial assistance. The United States District Court for the Western District of Pennsylvania ruled in favor of the institution and held that the Title IX enforcement regulations were invalid. On appeal, the third circuit Federal Court of Appeals ruled that:

(1) the private coeducational institution was a recipient of federal financial assistance within the meaning of Title IX, even tgough that assistance was recieved indirectly through its students.

(2) the assurance of compliance form required by the Department of Education was authorized and was valid.

(3) the Department was within its authority in terminating federal financial assistance to the students and to the institution for the institution's failure to execute and file, in accordance with the regulations, an assurance of compliance form.

In the district court, the Department claimed that the furnishing of GSLs as well as Pell Grants made Grove a recipient of federal financial

assistance so that it became subject to Title IX. The U.S. Department of Education has construed the phrase "federal financial assistance" to include educational grants paid to students, and thus, received indirectly by the schools which they attend. Grove City College has lost two appeals in the lower courts.

In clarifying the intent of Title IX as to what constitutes a program or activity, the U.S. Supreme Court has now decided that Pell Grants represent financial aid to an institution's own financial aid program and it is the financial aid program that must be regulated under Title IX's nondiscrimination provision. The strategy on the part of the current administration has been found to be that of working on one student aid program at a time in advocating that Guaranteed Student Loans and Pell Grants are to be considered as aid to the student and not aid to an institution, even when the realities of college finances, particularly at private schools, suggests that most institutions would not survive without federal student aid. The Justice Department has won one round of federal court decisions in which Guaranteed Student Loans have been found to be "contracts", not federal aid.[16]

Federal judges themselves are sharply divided over the issue of student aid, however the history of implementation under Title IX supports broad enforcement authority. Policy interpretation, letters of finding, and congressional resolutions have indeed claimed that the intent of Title IX has been to be adhered to by an entire institution.[17] Consideration by the U.S. Supreme Court regarding whether student aid should be counted as aid to an institution is important and appropriate for at least three major reasons. First, the decision will have a substantial impact on hundreds of institutions whose only federal funds come from student loans and grants. Second, the sharp differences in opinion among federal judges, particularly between the Third and Sixth Federal Circuit Courts, on virtually identical legal issues necessitates a resolution. Last, the issue has been smoldering since the passage of Title IX.[18]

Even though Congress has reaffirmed that the point of the Title IX statute is clearly to end sex discriminatory practices throughout all of postsecondary education, not merely the specific program receiving federal aid,[19] the Supreme Court has now added a new and challenging dimension to the improvement of educational equity for women.

NEED FOR MONITORING INSTITUTIONAL POLICIES AND PRACTICES

The critical importance of institutional policies and practices must not be overlooked in the equitable distribution of student aid dollars and in the assurance of maintaining a safety net for those with greatest need. Federal regulations for the Title IV programs of the Higher Education Act give institutions considerable discretion over the administration of student aid programs, particularly the campus-based programs of College Work Study, Supplemental Education Opportunity Grants, and the National Direct Student Loan Program. Institutional policies also establish the manner and the extent to which federal and non-federal aid programs are utilized on campus. For example, fellowships and assistantships for women may be administered by universities to comply with the maintenance of effort requirements under the College Work Study Program.

Regulations for the Guaranteed Student Loan Program require institutions to provide adequate information regarding curriculum, faculty, etc. in their recruiting efforts. The extent to which this information includes items of particular concern to women, such as the number of women on the faculty and in administrative positions and whether the campus houses child care facilities, is completely at the discretion of the institution. Federal regulations do not require that institutional information include area such as these which may be important to women and minorities.

Title IX further provides avenues for individual appeals, whereas the federal student aid regulations provide only for institutional appeals. The provisions for individual appeals provide some hope to women who have not received appropriate student financial assistance as intended by Congress. These avenues for individual appeals are of particular importance to black and other minority women who are frequently subjected to double discrimination. The National Advisory Committee on Black Higher Education and Black Colleges and Universities has concluded that "although there is the appearance that Black Americans have achieved equity in access to higher education in the United States, in reality this is not the case".[20] Thus, any discussion of women representing racial,[21] religious,[22] and handicapped[23] minority groups must be a discussion of the multiple barriers of race, religion, handicapping condition, and sex on equal educational opportunity.

Institutional leadership on the part of college presidents, university administrators, and members of boards of trustees is the bottom line in efforts to improve sex equity in student financial assistance. University boards of trustees, in particular, can play a more useful role in shaping institutional practices by restructuring committee systems and reemphasize the board's role in evaluating policy.[24] The female membership on boards of trustees is an especially valuable resource for making sure female students are provided with adequate financial support systems to complete school. Senior officials must consistently and explicitly express committment to equalizing student aid. This committment can be best expressed in university annual reports, statements of policy and procedure, recruitment guidelines, and public addresses.

Meanwhile, Title IX seems to have actually exposed a new and complex version of sex discrimination - that of passive resistance and officially making decisions on non sex-discriminatory basis rather than outright blockage of women's education ascent. University administrators are known to have become sophisticated at hiding discriminatory practices, even when affirmative action reports and civil rights assurances have been filed with federal agencies. The current U.S. Supreme Court case of Grove City vs. Bell appears also to be a sophisticated attempt to permit the continuation of discriminatory practices in college athletic programs and others by applying legal logic to peripheral issues such as questioning whether or not student aid should be considered as federal aid to the institution.

The issue of possible discriminatory practices on the part of plaintiff universities is not mentioned in court briefs, when in fact, evidence suggests that the very universities involved in federal litigation are far below national averages in percentages of women represented on the faculty and in administrative positions.[25] Legal briefs filed in federal courts

not only do not describe the student aid distribution on the basis of gender within the universities involved, but also do not mention any sex equity progress which may have been made relating to admissions, faculty appointments, or women in administrative positions. Evidence is quite substantial that the very universities which are plaintiffs in federal courts arguing that they do not have to comply with Title IX are not models of excellence for educational equity.[26]

GUIDELINES FOR ASSESSING INSTITUTIONAL SEX EQUITY IN STUDENT FINANCIAL ASSISTANCE (see Appendix C)

The implementation of student aid sex equity guides has been found to serve many institutional purposes.[27] Besides being used as a diagnostic tool for identifying and eliminating barriers to sex equity, such a guide can be used as a critical information data base providing chief executives with specific trend analyses concerning the condition, policies, and practices of their institutions. As an organization development tool, this guide can stimulate discussion and familiarize facutly, staff and students with aspects of their own behavior and the behavior of others that may subtly and unintentionally present barriers against women.[27]

Even though universities have been required and many still do implement self-assessment guides, there are still inequities in student aid. Institutional self assessment guides have been mandatory, but research conducted by Nat Caliendo and John Curtice has found problems:

> A self-assessment guide, no matter how well intended, inclusive, systematic, or in-depth, cannot assure that sex discrimination is eliminated from policies and practices found in those offices responsible for disseminating campus-based student aid programs. The document can only guide institutions toward points of awareness of real or potential acts of discrimination, no matter how unintentional. The attitude of those responsible for self-evaluation efforts is of the greatest importance. The law and the attendant regulations are shrouded with ambiguities in intent and interpretation. It is easy to gloss over the requirement to search out policies and practices which may be discriminatory. Administrators responsible for self-evaluation efforts as well as administrators of programs to be assessed must, in good faith, enter into this key initial task with sincere intentions and with a receptivity to the principle at stake.[27]

Sex equity in student aid should be monitored closely, not only by the Office for Civil Rights and individual institutions, but also accrediting agencies.

III. SIGNIFICANT DEMOGRAPHIC AND ENROLLMENT TRENDS INFLUENCING FEMALE PARTICIPATION IN STUDENT AID

Clearly, the increased participation of women in higher education has been a major aspect of the overall growth in college enrollments and one of the most dramatic changes during the past 12 years has been in the aspirations of freshmen women and in how women are viewed by both sexes[1] (see Appendix D). The availability of student aid has made a substantial difference in the lives of many women in making college attendance possible and Title IX as well as shifting cultural attitudes have contributed to the achievement of access for female enrollment in postsecondary education. The Bureau of the Census has reported that college enrollment for women has increased 77.4 percent from 1970 to 1980, compared to a 22.6 percent increase for men (See Appendix E-5). The current ratio for students of all ages was 108 women for every 100 men in 1981.[2] Projections issued by The National Center for Education Statistics indicate a decrease in total enrollments for postsecondary institutions from 12.3 million to 12.1 million over the next seven years while the proportion of female students is expected to stabilize at 52 percent.[3]

However, the enrollment patterns of women are substantially different than that of men, necessitating a re-examination of student aid policy. Any federal or non-federal student aid policy must be related to enrollment trends of women as well as men. For example, women are very dependent on low cost institutions and programs particularly for the non-traditicnal career areas, especially in graduate education and first professional careers of medicine, law and optometry (see Appendix E). A close examination of enrollment patterns is a critical first step to improving student aid policy.

SOCIAL AND CULTURAL FACTORS INFLUENCING FEMALE ENROLLMENT IN POSTSECONDARY EDUCATION

Many complex variables enter into a woman's decision to enroll in college, such as shifting cultural values, changes in the labor market, and changes in social policy. Student aid is but one factor among several that influences enrollment decisions. Shifts in participation rates may take place over long periods of time and these shifts can reflect changes in attitudes and expectations, economic and labor market conditions, and family structure. The passage of Title IX, in particular, has had an impact on increased female enrollment and student assistance in non-traditional areas.

An important factor in whether or not women enroll in postsecondary education and thus participate in student aid programs is simply the issue of educational expectations. Educational expectations are a product of career training, parental expectations, self confidence, and value attached to education. There has also been a great deal of research undertaken to understand what factors influence students' choices concerning math and science education. Much of the research points to two key groups as powerful

influences on young people's career choice: parents and teachers. Many women who have become successful in scientific fields report that it was the influence and encouragement of a single teacher that made the difference. Such things as exposure to same-sex role models, sincere praise for a job well done, and advice on the value of math and science for future careers, all tend to make a big impact on girls' choices.

Federal research sponsored by the National Institute of Education, clearly indicates the significant variables impacting female enrollment in postsecondary education:

- Factors influencing the achievement and participation of women as well as men in mathematics include: positive attitudes toward mathematics, perceived need for mathematics for future carrer and educational plans, influence of significant others, including parents, teachers and counselors. The best predictor of what courses girls would take was their perception of their father's educational expectations [4]

- Women are more likely to enroll in advanced mathematics if: they receive support and encouragement from their parents to take mathematics; their previous experiences in mathematics have been positive; they test high on mathematics achievement tests; advanced mathematics is required in their career plans; and their geometry teacher provided interactive instruction and ample feedback to both men and women students.[5]

- More women enroll in college remedial math programs as a prerequisite for other math courses.[6]

- Research on the relationship between education background and mobility into the executive ranks of government concluded that three primary areas at the undergraduate level allow maximum executive mobility - the physical and biological sciences, business, finance and economics, and engineering - and these are areas in which women are less likely to major.[7]

- Women and minority group junior faculty are underrepresented in academia and in the field of educational research. They carry heavier teaching loads than their white male counterparts, suffer from social and cultural discrimination, and are excluded from mentor relationships and the "old boy network".[8]

SIGNIFICANT ENROLLMENT TRENDS

The past decade of female enrollment throughout postsecondary education has been characterized by significant changes in both the composition of students as well as the type of institution attended. The expansion of public 2-year institutions, offering open admissions, low tuition, and flexible scheduling have enabled many women to combine work, family responsibilities and education. NCES has reported that between 1970 and 1981, the proportion of students in 4-year institutions has declined from 74 percent to 62 percent, while the proportion of ~~full~~

women students in two-year institutions has increased from 25 percent to 41 percent

time students decreased from 68 percent to 58 percent during the same period.

Large increases in female enrollment coincided with the expansion of both federal legislation and federal policies aimed at reducing barriers to higher education. Most notable, Title IX of the Education Amendments of 1972 has explicitly prohibited sex discrimination in admissions, athletics, student activities. Throughout the 70's substantial appropriation increases and program expansion occured in federal student financial assistance. In spite of impressive rates of increase, actual enrollment numbers for females are disproportionately small, particularly for career areas of computer sciences, engineering, and first professional careers of medicine and law (see Appendix E). Student aid policy makers must recognize and adapt to the following significant enrollment trends:

- Part-time enrollment is increasing at a faster rate than full time enrollment.

- Even though women have increased their participation rates, research on changes in college participation rates and student financial assistance has found that there was a decline among dependent female students between 1974 and 1981 in the lowest income group ($0 - $7,500) while there was an increase for almost all other income categories. Thus, females with the largest financial need and the lowest participation rates experienced the greatest enrollment decline.[9]

- Of the 1.7 million adult education (all part time instruction) participants in the income category under $7,500, 69 percent were women. For income categories $7,500 to $14,999, the proportion of female participants was 64 percent. The proportion of male and female participants in adult education at or above $25,000 were virtually equal.[11]

- In 1972 and 1980, about three times as many female high school seniors as males planned to major in education, although there has been a decline from 18.8 percent to 10.3 percent among females and from 6.0 percent to 3.4 percent among males. However, education is now attracting fewer academically high achieving young women.[12]

- In a comparison of the years 1974 and 1981, participation rates for dependent women exceeded those for dependent men, except in the lowest income category ($0 - $6,000). Male participation rates declined over the period, while those for women increased. Participation rates for men dropped in every income category except one since 1974. The biggest losses were in the lowest income groups. The changes in participation rates for independent males and females are similar to those for dependents. Men's rates declined, while women's increased.[13]

- Figures released by The Bureau of Census show that since 1974 there has been a substantial demographic shift toward increased participation of adults aged 25 and over in postsecondary education programs. For example, the population aged 30 to 34 increased 37.2 percent from 1974 to 1981 while the enrollment figures for this group increased 75.2 percent.[14]

Enrollment Trends in Graduate Education

One only has to look at recent statistics on female recipients of doctoral degrees to recognize the plight of women in successfully participating in graduate education. (See Table 15) The major obstacles to graduate study for women who entered graduate school and dropped out or who want to go but have yet to enter are financial limitations and family responsibilities. Patricia Cross, a researcher with the Education Testing Service, has found in a study of graduate women that:

> For women, graduate study poses problems that are different from those encountered at the undergraduate level and that sharpen the conflicts between traditional roles and alternative roles. The typical age for women in graduate school is also the age when society makes its greatest demands for traditional role behavior. Women between twenty-two and thirty both expect and are expected to be wives whose husbands are establishing their own careers and also to be mothers of preschool children. This traditional role frequently conflicts with the student and scholar role. . . . Few would maintain that a master's degree in any field is necessary or even desirable for women who expect to live out their lives as wives and mothers, and many people would argue that a Ph. D. is a downright disadvantage. Thus graduate education for women is more controversial than college eduction. It is also much more difficult because the woman who embarks on this path runs into the barriers erected by the broader society as well as those erected by graduate and professional schools.[15]

An American Council on Education report on the graduate eduction of women has pointed out several factors impacting attrition and completion rates in graduate education programs. First, the problems of graduate school women differ for unmarried women recently out of college and for married women with children (both those who return while their children are young and those who postpone graduate work until their children are in school). The most striking difference seems to stem from the attitudes of faculties toward granting financial assistance, and it is closely related to the ability of a woman to study full time. Further, women tend to take longer to get their degrees and their dropout rate is higher. And last, but not least, when there are more women on college and university faculties who can serve as models and counselors for students, the women who enter graduate school will do so with a better understanding of the kind of commitment they are undertaking.[16]

Enrollment Trends in Math, Science and Engineering

Experts have predicted critical shortages in the fields of engineering, computer science, mathematics and the physical sciences, yet it is these areas in which women have historically been underrepresented.[18] The National Science Board Commission on Pre-College Education in Mathematics, Science and Technology reports that in 1981, 50 percent of the teachers newly employed nationwide to teach secondary sciences and mathematics were actually uncertified to teach those subjects. It is well known that the field of education is predominantly women.

Congressional testimony has noted that, in fact, the very jobs that are increasing the fastest are the very jobs where women have not been employed and the very career areas where women have not been substantially enrolled. Holly Knox, former director, Project on Equal Education Rights, has testified before Congressional committees investigating math and science education that:

> Traditionally-female occupations are undergoing enormous change. An estimated 80 percent of working women are now concentrated in occupations which are rapidly declining or becoming obsolete as a result of technological advances. Jobs such as bank teller, telephone operator and clerical worker are undergoing major changes which will result in dramatically fewer jobs available in fields in which women have traditionally been concentrated. This revolutionary change in the nation's labor market will have a devastating impact on women. Not only will women face job displacement, but they also will face long-term or even permanent unemployment because few will have the resources or opportunity to acquire the necessary skills to enter and advance in the techncial job market. . . .Perhaps the greatest barrier to the achievement and participation of young women in mathematics and science is the persistent cultural bias that these fields are properly in the male domain. The consequences of this perception are severe.[18]

A fundamental concern underlying the enrollment of women in high technology fields is that of retention and attrition. One National Institute of Education sponsored research project concluded that female attrition in math tends to result from voluntary withdrawal and reflects problems of personal integration into educational and social networks, while male attrition tends to result from low academic performance and reflects an adaptation process to perceived occupational opportunities.[19]

Trends that appear promising for increasing enrollments and providing financial assistance for women in non-traditional fields are that of improved business/higher education partnerships.[20] The National Commission on Higher Education Issues has concluded that, "The interdependence between higher education and the private business sector is much greater than is commonly recognized. In fact, a strong national economy reflects, and is fundamentally dependent on, a strong community of higher education. Accordingly, both business and higher education should recognize and act on

the unrealized potential for enhanced cooperation and increased productivity."[21] One exemplary practice for promoting women is that of The National Consortium for Graduate Degrees for Minorities in Engineering, a joint effort by universities and private industry to increase the number of blacks, Mexican-American, Puerto Ricans and American Indians earning graduate degrees in engineering. This organization comprises 42 leading high-technology companies and research laboratories and 40 top-ranked engineering schools.[22]

Enrollment Trends in Vocational/Adult Education

The National Commission on Excellence has pointed out that we are now living in a lifelong learning society. Virtually all citizens can expect to continue their learning in some form throughout their lives. Recent testimony during the U.S. Department of Education public hearings focusing on student financial assistance for reauthorization of the Higher Education Act of 1965 pointed out that most college students enrolled for credit are already over 21 years of age, and more than one third (36 percent are 25 years old and over. And the number of noncredit students over traditional college age who are served by colleges and universities is even greater.

Dr. Charles Campbell, testifying on behalf of the National University Continuing Education Association noted that Harvard University currently enrolls about 16,000 degree candidates in all its "regular" programs, plus roughly 45,000 continuing education students, most of whom are adults in their 30s, 40s, 50s, and 60s enrolled in noncredit continuing professional education activities. He further states that we not only have to encourage flexibility in the existing education system, but also to find ways to produce effective collaboration among and between learning systems - such as business, industry, labor unions, trade and professional associations, museums, government agencies, etc.[17]

TRENDS IN DEGREES CONFERRED TO WOMEN SINCE 1970

NCES figures indicate that women now receive bachelor's and master's degrees in equal proportion to men, yet receive only 31 percent of total doctor's degrees. Since 1970 the number of female degree recipients qualrupled in medicine and increased by nine-fold in law, however, total female enrollments in these respective fields as of 1981 is 25 percent in medicine and 32 percent in law when compared with males.[23]

Even though NCES reports an equalization of female bachelor and master degree recipients, when one looks at enrollment figures and data on degree recipients at Ivy League schools, females do not make up even half of the freshman enrollments nor degree recipients. A spot check of prestigious universities indicates that much improvement still must be made for encouraging female enrollment.[24]

Student aid policies need to adapt to the following trends so as to further achieve education equity for women:

- In 1971, women accounted for 43.4 percent of the bachelor's degrees, 40.1 percent of the master's degrees, 14.3 percent of the doctoral degrees, and

6.5 percent of the first professional degrees. In 1981, women accounted for 49.8 percent of the bachelor's degrees, 50.3 percent of the master's degrees, 31.1 percent of the doctoral degrees, and 26.6 percent of the first professional degrees.[25]

- For 1981-82 women earned 4.7% of the doctorates in engineering and 9.1% of the doctorates in computer sciences.
- For 1981-82 degree awards to black women increased 8 percent for bachelor's, decreased 12 percent for master's, increased 29 percent for doctor's, and increased 71 percent for first-professional degrees.[26] In spite of impressive percentage gains, their numbers are still far below proportional expectations.

Table 9

A Profile of 1981-82 Recipients of Doctorates

	Arts and Humanities	Computer Sciences	Education	Engineering	Life Sciences
# Conferred	3,560	220	7,226	2,644	5,565
Male	57.6%	90.9%	51.2%	95.3%	72.3%
Female	42.4%	9.1%	48.8%	4.7%	27.7%

	Mathematics	Physical Sciences	Social Sciences	All Fields
# Conferred	720	3,348	6,250	31,048
Male	86.7%	86.3%	63.3%	67.6%
Female	13.3%	13.7%	36.7%	32.4%

Source: National Research Council, Survey of Earned Doctorates, 1983.

FEMALE PARTICIPATION IN WELFARE PROGRAMS

Research conducted for the National Commission on Student Financial Assistance concluded that severe contradictions existed in federal public welfare policies and college opportunity policies. Women are predominant participants in public welfare programs as Aid to Families With Dependent Children and Food Stamps.

The National Urban League has reported that in 1970 about 30 percent of black families were headed by women; by 1980 42 percent were. More than half lacked high school diplomas, three fifths lacked jobs; almost two-fifths of female-headed families received welfare and the current poverty rate for black female-headed households is 45 percent.[27]

IV. IMPACT OF FEDERAL POLICY ON STUDENT AID FOR WOMEN

It is important to re-examine the current needs analysis systems in federal student aid programs and look closely at the differential impact on women. In order to arrive at an appropriate balance in student aid policy it becomes critical to match needs analysis with emerging demographic trends for all classes of students. Eligibility for federal student aid programs has always been tied to some concept of "need". However, there has been an ongoing ambivalence on the meaning of need, particularly for Guaranteed Student Loans.[1] Financial need for federal student aid is defined by the U.S. Department of Education as "the difference between a student's cost of attendance and his or her expected family contribution".[X] What appears to be a very simple and non controversial definition, actually restricts women disproportionately compared to men in obtaining a postsecondary education. The meaning and relevance of need is continually changing, continues to be important and must be related to the enrollment characteristics of both men and women.

The following policy issues must be addressed in student aid formulas so as to improve the capability of all women to participate in postsecondary education, and thus achieve a more appropriate balance in federal student aid programs.

WOMEN ARE TWICE AS LIKELY TO BE CLASSIFIED AS INDEPENDENT STUDENT AID RECIPIENTS AND HAVE SUBSTANTIAL UNMET FINANCIAL NEED

Studies by The National Commission on Student Financial Assistance[2] and the American College Testing Needs Analysis Service[3] indicate that women tend to be twice as likely than men to be classified as independent students at the freshman level (66 percent vs. 34 percent) and have more than twice the amount of unmet need when compared to dependent students.[4] As a consequence of having the burden of large amounts of unmet need, women tend to drop out of school, enroll as part-time students, increase their work load or assume more loans. Independent students attending private schools have an average unmet need of $1,[illegible], vs. $247 for dependent students; independent students attending public schools have an average unmet need of $1,488 vs. $443 for dependent students; and independent students attending proprietary schools have an unmet need of $2,160 vs. $1,651 for dependent students. (See Appendix C) During 1981 - 82, 13 percent of the students attending private schools were independent, 39 percent of the students attending public schools were independent, and 54 percent of the students attending proprietary schools were independent.

It appears most likely that women who are faced with large amounts of unmet need simply drop out. An analysis of trends for independent females, utilizing national norms for financial aid applicants from the American College Testing Service, indicate that while the number of independent females is twice that of independent males at the freshman level, the proportion of independent females to independent males at the graduate level is substantially less (45 percent/females vs. 55 percent/males). This drop is particularly pronounced between the senior level and the graduate level (see Appendix B-1).

Independent students attend less costly schools, yet their total

expenses are significantly higher than dependent students. For example, average student expenses for independent students attending public schools during 1981 - 82 include $702 for tuition and fees and $5,370 for other expenses with total expenses amounting to $6,125. Average student expenses for dependent students attending public schools the same year include $921 for tuition and fees and $2,844 for other expenses with total expenses amounting to $3,833. A recent College Board study on the utilization of student financial assistance at community colleges found that the percentage of independent student aid recipients in campus-based programs increased from 24.9 percent in fiscal year 1972 to 41.3 percent in fiscal year 1976, however, the average award for independent students at the undergraduate level fell from $866 to $780.[4]

In testimony before the U.S. House Subcommittee on Postsecondary Education, Larry Gladieux, executive director for the Washington Office of the College Board stated, "If there is a single feature of student aid programs today that undermines confidence in the system because of disparities in the way different students of like circumstances are treated, it is the definition of self-supporting status. The higher education reauthorization should be an opportunity to devise a new federal definition that distinguishes more simply, fairly, and accurately between students who can depend on parental support and those who cannot".[5] Linda Berkshire, testifying before Congress on behalf of the National Student Aid Coalition, a group of thirty-five national organizations and associations with an interest in student financial aid programs and policies, noted the following trends for independent students:

- The population over 25 in college has increased since 1974. In 1974, older students made up 18 percent of the enrolled population and in 1981 they made up 28 percent of total enrollment.

- In the Pell Grant Program, the participation of independent students has increased from 36.9% in 1976-77 to 48.3% in 1982 - 83. The percentage of the total of eligible independent Pell applicants under the age of 22 has actually declined from 32.1% in 1976 to 30.0% in 1982. There was a slight drop in independent eligibles between the ages of 23 and 30 and a growth in the percentage of over 30 year old eligible independent applicants from 20.1% to 25.0%.

- As a percentage of total recipients, participation by independent students in the federal campus-based programs peaked at 27 % in 1979 - 80 and has declined since that time. in 1981 - 82 independent students received 25% of the total dollars expended, compared to 21% in 1974 - 75.

- Data available do not suggest major abuses of the current definition of independence by students and their families.[6]

WOMEN ARE DISPROPORTIONATELY AFFECTED BY STUDENT LOAN DEFAULTS AND BANKRUPTCIES

Inadequate data and formulas utilized to calculate and report student loan default rates have been found to conceal problems and exagerate improvements.[7] Such is the case for determining impact of student loan

defaults and bankruptcies on women. A critical policy dilemma facing student loan officials is the question of how to curb rising default rates while at the same time assuring at least student access to a postsecondary education. Yet, variables which have been found by the U.S. Department of Education to be strong predictors of loan defaults, such as withdrawal from school, being black, having low income and holding relatively larger loans, being an independent student at the time of taking the loan, and being divorced or separated with a low family income[9], are not monitored in final reports for Guaranteed Student Loans (GSL), National Direct Student Loans (NDSL), or Federally Insured Student Loans (FISL). None of the state guarantee agencies collect gender information on GSL defaults. Further, in the most recent and extensive research by the National Commission on Student Financial Assistance of default rates in the Guaranteed student Loan Program, the largest federal student aid program, any data describing the sex, race or income of the defaulters was not studied because it was not available.[10]

Substantial evidence has indicated that women are much more likely than men to enter default status due to substantially low earnings upon college graduation, tendency to major in fields known for low salaries, being twice as likely than men to be independent students, more likely than men to drop out of school, if they get married they help assume husband's debt, if they are black, more likely to attend proprietary institutions having the highest default rates, and being disproportionately affected during employer layoffs. Research on patterns of accumulated borrowing and expected income for college graduates conducted by the Credit Research Institute at Purdue University has noted that "concern about levels of indebtedness must be conditioned on the basis of the student's anticipated income upon graduation".[8] A point of concern from this research that is apparent is that "undergraduate students in the occupations traditionally held by women (nursing, teaching, social work), which are characterized by very low starting salaries, will feel the greatest impact of education loans on their post education ability and willingness to borrow".

An extensive study of commercial bankruptcies by the Brookings Institution, sampling 3,600 bankruptcy cases in eight federal judicial districts, found that divorced women tend to be three times as likely than divorced men to declare bankruptcy (17 percent vs. 6 percent of divorced bankrupt individuals) and of the 2 percent bankrupt individuals who were widowed, all were women.[4] Bankruptcy rates have also been found to increase during periods of higher national unemployment rates and recessions. Congressional hearings on commercial bankruptcies have noted several characteristics which trigger bankruptcies and impacting women moreso than men: (1) Those having low paying jobs, have the highest tendency to declare bankruptcy, (2) The earnings of a woman, upon a divorce tends to be substantially less than the husband, if she has any earnings at all, (3) Bearing and raising children becomes both an added expense as well as an obstacle to the gainful employment of the mother.[5]

It has been suggested that to alleviate this problem schools should consider directing more grant funds or scholarships into those major areas where supply is short but salaries have not adjusted to reflect the shortage. Trends in college costs and starting salaries for college graduates suggest that women, and especially minority women, may encounter more serious college debt burdens.

Gender Information is Excluded in Default and Bankruptcy Reports

The best way of avoiding issues is to not collect information on problem areas. Current default rate reports in all student loan programs contain no information on the composition of borrower groups, yet major research analyses of student loan defaults have concluded that identification of trouble spots and improved statistical analysis are two actions that would help in developing steps to reduce the default rate. Research by Arthur Hauptman, has indicated that "identifying certain types of students who are chronic defaulters, and dealing with their problems, whatever they are, seems an appropriate way to try to reduce the default rate. Unfortunately, however, the data available on the correlation of defaults with borrower characteristics has occassionally been abused or misused in the past".[11] John Lee's study of Guaranteed Student Loan default rates has also concluded that "the characteristics of the sample and the way in which default rates are calculated may be more important in explaining the differences than any policy or management factor".[12] Formulas and reporting mechanisms for default rates involves choices about what is to be emphasized and what is to be minimized; they can be used do disguise and to hide trends as well as to highlight them. Defaults are reported differently for different loan programs.

Two default rates are reported for the Guaranteed Student Loan program which specifies a $12,500 maximum cumulative debt for undergraduates and $25,000 for a student who borrows for both an undergraduate and advanced degree. The "default claims percentage" is calculated by dividing the dollar amount of cumulative defaulted loans by the amount of cumulative matured loans and the "net default percentage" is calculated after making the following subtractions from the amount of cumulative defaulted loans: collections, loans transferred to private collectors, loans in litigation, and loans that have been written off.[13] No analysis is given on the characteristics of students and no information regarding gender is collected or reported by the Department of Education or any of the state guarantee agencies.

Default reports for the National Direct Student Loan Program indicate a "default rate" which is computed using only those loans in an institution's loan portfolio and a "potential loss rate" which is computed using not only the loans in an institution's loan portfolio, but also loans that institutions assigned and referred to collection to the U.S. Department of Education. The most recent institutional listing of default rates released by the Department of Education indicates that those institutions found to have some of the highest default rates are predominantly black colleges and proprietary institutions. Within the latter category a substantial number of beauty schools, secretarial schools, and medical training institutes, enrolling mostly women have the highest default rates. For some of these schools both the default rate and the potential loss rate is as high as 70 and 80%.[13]

Curtailing Defaults, Delinquencies and Bankruptcies

Evidence presented to the National Commission on Student Financial Assistance suggests that by examining the characteristics of defaulters, including gender differences, and by adjusting federal student loan programs

to assure access to those students found most likely to default, the rising federal costs for defaults and the personal agony of being in default or bankruptcy may be curtailed. Currently the federal role in guaranteeing student loans differs under each program, in which the federal guarantee against default serves as a substitute for the collateral required of individual borrowers for most types of loans.

Several comments presented during a public hearing at the University of Utah[15] by the National Commission may suggest possible solutions for reducing the burden of default and bankruptcy for women:

- Ralph Olmo, Comptroller of the U.S. Department of Education, stated,"We currently have about $3.3 billion in defaulted receivables in the Department of Education. About 2.4 of that is in guaranteed student loans, including FISL, there's no doubt that that number will increase in future years because over the last three years we've lent out more money under the GSL than all the years put together. We have $22 billion in outstanding GSL loans, and most of those students are still in school. So we're going to see a large increase in those defaulted loans come into the government portfolio in further years. . . .It is not clear that the Congress has focused even yet on resolving the dicotomy between a low default rate and loan accessibility.

- Rick Jerue, Chief executive director for the National Commission stated "There is a higher risk of defaults among the low-income and minority students, who are precisely the kinds of students that the federal policy is aimed. . . .It might be wiser to increase other kinds of assistance to financially high risk students and to use the loan program maybe less for them and more for others".

- David Gardner, current president for the University of California stated "There may be students who are unwilling to borrow because they are in a field of study where the level of compensation is very modest indeed compared with those studying in some other field, and so they wouldn't even show up on the guaranteed student loan program at all much less the default rate. . . .If the default rate for the students in the field where the prospect of earnings is not very bright is higher than in fields where the prospect for earnings is higher, then that perhaps ought to offer us some guidance in respect to how we undertake to provide student financial assistance in respect to whether it should be work study or guaranteed student loans".

- David Morse, U.S. Senate Education Committee staff, stated "It always seems that the cost of going after a defaulter is frequently a lot greater than any actual collection that might be made. . . .We hear frequently that student bodies, particularly those of proprietary institutions and two-year schools, have income characteristics lower than those attending four-year public or certainly private institutions and that the proprietary and two-year students frequently have difficulty receiving guaranteed student loans".

FEDERAL PUBLIC ASSISTANCE AND COLLEGE OPPORTUNITY POLICIES ARE CONTRADICTORY

Compounding the economic hardships created by the labor market factors, women are further disadvantaged by job histories that are generally not as extensive as those of their male peers. When men are unemployed, they generally are eligible to receive unemployment compensation, disability, or workmens' compensation. Women, however, frequently do not qualify for such programs and must rely on welfare programs such as Aid to Families with Dependent Children.

Conflicting purposes and procedures of public assistance programs produce disincentives for economically disadvantaged women who seek to achieve self-sufficiency through education. The public assistance programs creating the greatest disincentives for women to participate in federal student aid programs are Aid to Families with Dependent Children (AFDC), Social Security Benefits, Food Stamps, Medicaid, Public Housing and Unemployment Insurance. These disincentives frustrate the efforts of women to achieve productive careers and perpetuate dependence on public assistance payments. Further, the disincentives have created barriers to college enrollment by either reducing or categorically eliminating benefits for college enrollment.[9]

FEDERAL POLICY NEEDS CLARIFICATION IN CALCULATING CHILD CARE EXPENSES FOR COST OF ATTENDANCE

A major point of concern for many women is the expense of child care in calculating cost of attendance. Federal regulations for the campus based programs of CWS, NDSL and SEOG use the phrase "reasonably incurred" as part of the criteria for establishing child care expenses (46 CFR 675.11). Thus, the subjective element of determining reasonableness gives the institution complete discretion in determining what expenses are allowed. Federal regulations and institutional policies are not clear on what constitutes child care expenses that are "reasonably incurred". CWS regulations further provides that an "institution, in individual cases, may adjust the cost of attendance if (1) The financial aid administrator believes the cost of attendance determined does not accurately reflect the student's actual cost of attendance, and (2) The institution documents all adjustments in writing with an accompanying explanation and makes them part of the institution's records". (46 CFR 675.11) It is not known to what extent adjustments are made to cover the costs of actual child care.

Previous research on helping re-entry women pay college costs, funded by the Women's Education Equity Act Program of the U.S. Department of Education, noted that reasonable education related costs could include child care and maintenance expenses. This would include the costs of food, clothing, housing, medical and dental care, schooling expenses and transportation for child care.[10]

Findings from child care research for working mothers can be applied for mothers attending school. Such surveys show a strong consensus about the kind of care working parents want for their children. Top of the list is perhaps the least common form of child care in America: day care on company premises.[11] Whether or not a postsecondary institution has child care facilities on campus will also be a major factor in not only the costs - but also the actual facilitation of enabling women to get out of the house, away from the kids and to attend class.

Deep value splits exist in how we view the right of mothers to work and/or attend postsecondary institutions and the effect of their work on the family, society, their children and themselves. This lack of consensus seems to be behind the nation's inability to deal effectively with the needs of women and their children. Studies on child care have found that regardless of what people think about the social-political-sexual issues, they can agree that many women need to work or go to school for financial reasons, and therefore that there must be some arrangements for the care of their children. They also agree that employers must show some flexibility in helping these women, and that there is a particular need to help poor women who currently may be on welfare. The solution to the nation's paralysis on child care may be to recast the way we define the problem.

An emerging policy issue related to child care expenses is reflected in the new Federal Child Support Enforcement legislation. That is, many divorced or separated women must cover child expenses on their own, even though a court order has been issued requiring the father to pay expenses. Adjusting to this financial burden, actually prohibits many women from even thinking about the possibilities of affording school for themselves. When individuals are faced with a struggle to physically survive, spending money for food, clothing and shelter takes priority over spending money for education.

IMPACT OF STUDENT FINANCIAL ASSISTANCE ON CAREER CHOICE AND FEMALE EARNING POTENTIAL

Current federal student aid operates in a vacuum, providing no incentives for universities to promote degree programs in which graduates (especially women and minorities) acquire a higher probability of landing adequately paid and personally satisfying jobs. Neither are federal incentives provided to develop corporate and business partnerships with federal student aid programs so as to ensure a more appropriate match between postsecondary education programs and labor market demands.[12] Also, federal policy has not sufficiently adapted to the trend that many women are now part time, independent students and that number is growing rapidly. Much attention has focused recently on the high unemployment and underemployment rates of recent college graduates. Postsecondary institutions and federal student aid policies simply have not met the demands of the constantly changing labor market.

Federal student aid policy is a very useful mechanism by which incentives can be provided for schools and corporations to change the occupational distribution of women. Figures from the U.S. Bureau of Labor Statistics show that a majority of the women who make up 43.3 percent of the work force, are still clustered at the bottom of those who are employed. Some 34 percent are in clerical jobs and 27 percent are in service occupations acting as waitresses, retail sales personnel and medical aides. Even the 18 percent listed as professionals are believed to consist mostly of teachers and nurses earning relatively low pay.[13] Further, the current deindustrialization of our country necessitates not only a redistribution of women into other career areas, but also a stronger emphasis on retraining and lifelong learning.[14] Student aid policy should encourage [illegible] to develop marketable skills which are needed in the labor force. C[illegible]c labor market ads are looking for people to fill such positions as field service engineers,

satellite communication specialists, financial program control analysts, commercial property raters, international student advisors, telemarketing representatives, systems application programmers, computer data base designers, artificial intelligence specialists, systems engineers, and telecommunication network scientists.[15] It is well known that women do not receive bachelor's degrees in these areas, let alone masters or doctoral degrees.

In fact, the College Work Study Program and the State Student Incentive Grant Program, perhaps two of the best federal student aid programs for improving career choice options and work experience for women, actually include many regulatory barriers for facilitating career development for women. College Work Study regulations, for example, prohibits a job location and development project from locating or developing jobs for students upon graduation and eligibility for CWS is restricted to full time students.

One precedent that is worthwhile to take note of is the recent education-oriented $42.5 million settlement of a class action employment discrimination claim negotiated between the U.S. Equal Employment Opportunity Commission and General Motors Corp.[16] This settlement features a $15 million educational package designed to provide scholarships for affected GM employees and members of their families at four-year and two-year colleges and technical schools. In addition GM has agreed to spend several additional millions on various training programs within the company, including executive development, career development and training for supervisory jobs. Federal policy analysts may want to monitor the impact of this decision and consider federal legislation mandating a portion of all class action awards in sex discrimination cases to be utilized for education purposes.

Regardless of areas of study, future employment factors have been found to be critically important in a woman's selection of a major.[17] Career choice involves many steps and variables of which the availability of sufficient student aid can be the decisive variable as to whether or not to enroll in school. This is especially true for women where the initial selection of a college major is considered to be a critical step in career choice and development. Economic/pragmatic influences carry considerable weight in the selection of a major area of study for women. Study results indicate that opportunity for re-entry into the labor force, preparation for desired careers, and opportunity for employment directly affect the selection of a major.[18] One study sampling 437 junior and senior female undergraduate students enrolled at Iowa State University analyzed three variables influencing the selection of major - academic, social, and economic/pragmatic influence. Success in major course work was found to be the major academic influence. Opportunity to work with people was important in the choice of major for all students, but was of less concern for those concentrating in the bio-technical fields. Though prestige of potential career was not of great value to any one group of students, it was of more concern for students majoring in the biological sciences than for those in the social sciences.

PART-TIME STUDENTS ARE RESTRICTED FROM PARTICIPATING IN MOST FEDERAL STUDENT AID PROGRAMS

Women far outnumber men as part time students both in enrollment numbers as well as in rates of increase. However, most federal student aid programs restrict the participation of these students. The Bureau of Census of the U.S. Department of Commerce has reported the following trends of women enrolled as part time students from 1970 to 1980:

- Female students 35 years and over outnumber males nearly 2 to 1 (13.5 percent to 7.5 percent).
- For all undergraduates the number of males increased from 582 thousand to 920 thousand. The number of females increased from 482 thousand to 1.25 million.
- For two-year college students the number of males increased from 275 thousand to 456 thousand. The number of females increased from 239 thousand to 713 thousand.
- For graduate students the number of males increased from 342 thousand to 413 thousand. The number of females increased from 243 thousand to 445 thousand.[19]

NCES has reported the following concerning female participation rates in adult education, most of which is part-time enrollment: " While it is generally true that persons from lower economic levels participated less frequently in adult education programs, women in the lower income groups participated at a higher rate than men in these same income groups. For example, of the 1.7 million adult education participants in the income category under $7,500, 69 percent were women. This relationship also held true for women in the income categories of $7,500 to $9,999 and $10,000 to $14,999 where the proportion of female participants was 64 percent in both categories. In income categories at or above $25,000, the proportions of male and female participants in adult education were virtually equal."[20]

Many women are prevented from taking more than one course because of lack of funds, work responsibilities, family commitments or lack of self-confidence. Also, enrolling as a part-time student is known to be a major response to increased tuition costs.[21] For many women, even the "half-time" threshold for federal aid is an obstacle. The National Center for Education Statistics reports that females accounted for 56 percent of participants in adult education in 1981, with substantially greater numbers of women enrolled in adult education programs at the lower income levels. Yet, women do not have adequate access to student financial aid for these programs either from the federal government, institutional scholarship programs, or from private employee student aid benefit programs.

One analysis of financial aid utilization by part time students in the state of New York found that less than one out of every four part-time undergraduate students receives some form of financial aid. The majority (67%) of this aid is from self-help programs, with GSL alone accounting for 65 percent of all aid received. Also, the utilization and average award

received by part-time students varied significantly by type of institution. Part-time graduate students had the lowest utilization rate of any category of students, with only one of every five students receiving some form of financial aid.[22] Further, The National Association of Student Financial Aid Administrators has reported that virtually no institution, less than one percent, used a full ten percent allowable for part time students from campus-based student aid allocations.[23]

REQUIRED FEDERAL RECORDS AND REPORTS DO NOT INCLUDE INFORMATION ON GENDER OR MINORITY STATUS OF STUDENTS SERVED

Major federal reports for student aid programs - Education Department audit guide for student financial aid programs, audit reports, fiscal operations reports (comprehensive annual reports describing the use of funds for the three campus-based programs) submitted by institutions, Pell Grant End of Year Reports, annual budget justifications, and the Annual Evaluation Report of Department of Education Programs - contain no information relating to the distribution of student aid on the basis of gender. Even though it is important to examine the distribution of federal dollars by state, by income level, congressional district, and institutional type, it may be more important to consider the impact of federal program appropriations on women and especially minority women.

Reporting student aid distribution by income categories only, fails to recognize the slippage of females and minorities through the brackets. Thus, even though it is important to know the income categories of aid recipients, it is even more important to collect data relationg to participation rates and average award per recipient on the basis of gender and minority status within these categories and to monitor closely the declines of these groups not only in federal student aid participation, but also overall enrollment trend declines.

V. PARTICIPATION PATTERNS OF WOMEN IN FEDERAL STUDENT AID PROGRAMS AND REVIEW OF REGULATIONS

The federal government now dominates student aid, accounting for almost 80 percent of total assistance. This money is made available to students and their parents directly by the federal government through educational institutions, and indirectly through state guarantee agencies and banking and educational institutions by subsidizing interest and/or guaranteeing loans. Although there has been an extensive expansion of federal student assistance during the 1970s, particularly with the creation of Pell Grants and the passage of the Middle Income Student Assistance Act, abrupt changes and cut backs are occuring in the 1980s. These changes must be carefully monitored so that all students can be guaranteed at least access to a postsecondary education. With federal budget deficits now at dangerous levels, it becomes imperative to re-examine regulatory impact, distribution of federal dollars, and student participation rates in the search for solutions to achieve equity in the most cost effective manner.

In assessing impact of federal student aid programs on women, a critical variable to be measured is equity in overcoming financial barriers. The U.S. Department of Education has determined that "equity in overcoming financial barriers is achieved if funds (Federal as well as other sources) are distributed so that students and their families with similar financial conditions and educational costs receive essentially the same financial treatment".[1] Women tend to have different financial conditions and greater educational costs when compared with men, thus, making it important to examine not only participation rates, but also average dollar awards and differential impact of federal regulations for males as well as females at all levels of postsecondary education.

AN OVERVIEW OF FEMALE PARTICIPATION IN FEDERAL STUDENT AID PROGRAMS

What appears to be a somewhat equitable distribution of federal student aid programs on the basis of recipient percentages reported in national surveys is actually not very equitable. Since federal student aid programs are formula based, it is important to examine moreso the formulas and the regulations so as to assure an equitable impact among all students. The subtle differences in these participation rates are not so subtle when one looks beyond percentage distributions and investigates restricting regulatory policies, lender discrimination on the part of commercial and direct lenders, differential impact of federal regulations, and abrupt changes in participation rates by income levels and institutional type. It is also critical to examine equity issues at all levels of postsecondary education, not just aggregated data at the freshman level. Detailed information on the distribution of student aid on the basis of gender at the graduate level is severely lacking.

In a study of participation rates among college freshman conducted for The National Commission on Student Financial Assistance, John Lee has found that in 1974, men and women were about equally likely to receive aid when examining participation rates. . In 1981, 48.6 percent of the women received aid compared to 45.7 percent of the men. (See Table 12) Women gained slightly in the probability of receiving aid in relation to men.

Overall, the changes in the proportion of both men and women who received aid were greater as family income increased. At the $40,000 and higher income level, the probability of receiving an award was approximately three times greater in 1981 then it was in 1974. Data from the American College Testing Program indicate that the proportion of women participating in student aid programs substantially decreases in later years of schooling, with a sharp decrease at the graduate level for both dependent and independent students. For males, the participation rates increase. (See Table 13)

Major characteristics of participation patterns in federal student aid programs include the following:

- An analysis of regulatory provisions, participation rates, percentages of total costs covered, and average awards per recipient indicate that the National Direct Student Loan, the Supplemental Education Opportunity Grant and the State Student Incentive Grant are of particular importance to women.

- Low cost of college or availability of student aid appears to be a major factor in the selection of a college for low-income students.

- There has been a reduction in the overall federal program participation rates for first-time, full time students since 1980. Only Guaranteed Student Loans showed an increase.

- Student burden (work and loans) has generally increased for all first-time, full-time students at a higher rate than the cost of education and the increase in median family income.[2]

Because student aid applications do not request information on sex or minority status, it becomes very difficult for federal policymakers to assess whether federal student aid programs are indeed reaching minorities and women as intended by Congress. Thus, vital information relating to female participation in the largest federal education program is not reported in major Department of Education documents such as student aid end-of-year reports or the Annual Evaluation Report. Even the annual Condition of Education issued by the National Center for Education Statistics does not contain a single statistic on federal student aid, nor has the National Institute of Education funded any research efforts designed to assess impact of any of the Title IV programs for higher education. Information on female participation in federal studen aid programs may be obtained from the High School and Beyond Survey conducted by the National Center for Education Statistics and the Cooperative Institutional Research Program conducted by the American Council on Education and the Graduate School of Education, University of California at Los Angeles. A major limitation of these data sources is that all information is based on self reports.

The High School and Beyond Survey is a nationally representative sample survey of 1980 high school sophomores and seniors in the United States. As a large-scale, longitudinal survey, conducted by the National Center for Education Statistics, the study's primary purpose is to observe the educational and occupational plans and activities of students as they pass through the American educational system and take on adult roles. The study

is intended to contribute to an understanding of factors that determine individual education and career outcomes and provides statistics on the education, student financial assistance, work, parent aspirations and parental ability and desire to pay for postsecondary education of young adults for the years following high school. Over 30,000 sophomores and 28,000 seniors enrolled in 1,015 public and private high schools participated in the (spring) 1980 base year survey. Statistical data tapes on the distribution of student aid are now available from NCES for the 1980-81 and 1981-82 academic years. This survey was used throughout this chapter to obtain gender participation rates in Title IV programs by type of institution and by income levels. ~~(See Table 6)~~

In looking at trends of the 1980 seniors for participating in postsecondary education between 1980 and 1981, NCES reported that women were more likely than men to enroll in a postsecondary institution upon high school graduation (51 vs. 48 percent). By February 1982, 63 percent of the 1980 seniors had entered some kind of postsecondary institution - 59 percent of males and 66 percent of females. The majority (53 percent) entered immediately (o.e., by October 1980). The percentage who entered immediately was highest for 4-year colleges (89 percent), lowest for vocational/technical institutions (62 percent). Four-year college rate of entry of 1980 seniors varied substantially by the student's socioeconomic states(SES) level: 61, 32, and 19 percent for those from high, middle and low SES background, respectively. The corresponding 2-year college entry rates were 27, 27, and 20 percent.[3]

Another major national data base which contains information on gender of federal student aid recipients is that of the Cooperative Institutional Research Program (CIRP) sponsored by the American Council on Education and of the Graduate School of Education, University of California at Los Angeles. Research utilizing these Freshmen Norms data has found that overall, the biggest growth in the percentage of students aided between 1974 and 1981 was in the higher income levels. Among lower income students, there was either a decline in the percentage of students aided or a smaller increase than that for the higher income students. Low income students were more likely to receive a smaller award in 1981 than they were in 1974. Students in the $12,500 and above income categories were more likely to receive a larger award in 1981 than they were in 1974.[4]

TRENDS IN APPLICATION RATES FOR FEDERAL STUDEN. AID

The National Center for Education Statistics has found that the rates of application for student aid among freshmen varied as a function of student plans, inclinations, and aspirations; family weatlh; family size; parental knowledge of financial aid programs; and expected schooling costs. This study of 1980 high school seniors concluded that the greatest differences in application rates were associated with parental knowledge about the Pell Grant program moreso than differences associated with family income or amount of savings for college. After controlling for family income, NCES found that the factors showing the strongest relationship with application rates were: (a) parental knowledge, (b) students high school grades, and (c) expected schooling costs.[5]

Student financial aid application rates, however, show trends in opposite directions for males and females. That is, greater percentages of females apply for student aid at the freshmen level and numbers gradually taper downward into the senior level with a particularly sharp decreasebetween senior year and graduate level. For males, this trend is exactly the opposite. The American College Testing national norm profile of financial aid applicants from 1974 to 1980 has indicated the following trends:

- Rates of financial aid applicants for independent students decrease for females, but increase for males from freshman through graduate levels.
- Women are twice as likely than men to be classified as independent students when applying for federal aid (66 vs. 34 percent) at the freshman level.
- Female students apply for student aid at higher rates than men at all levels of undergraduate (55 vs. 44 percent), but decrease sharply at the graduat level (44 vs. 56 percent. For male students, this trend is exactly opposite.
- From the freshman to sophomore level appliction rates for dependent females increase and decrease for dependent males. This seems to reflect enrollment increases at public two-year colleges.
- For 1979 - 80 the average dependent single need was $1510, while the average need for the self-supporting applicant was $2752. Thus, women tend to have greater financial need while attending school since they are twice as likely to be classified as an independent student.

These findings are based on an analysis of national norms representing a ten percent random sample of students who use the American College Testing Student Need Analysis Service for the purpose of applying for funds. (Table 13). ACT aid applicants represent 25-30 percent of all aid applicants throughout the country and a high percentage are from public institutions.

REGULATORY REVIEW OF FEDERAL STUDENT FINANCIAL AID PROGRAMS AND THEIR IMPACT ON EDUCATIONAL OPPORTUNITY FOR WOMEN (see Appendix G)

Many laws and regulations both reflect and reinforce discrimination. Current student aid policy must be re-examined and changed in order to minimize adverse impact on women. This re-examination must consider the most appropriate match among enrollment trends, student characteristics, economic needs, and job needs. In addition, it is beneficial to review those policies which serve to facilitate the participation of women in student aid programs and consider improving and expanding those aspects not only within programs but also consider their expansion to other federal student aid and women's educational equity programs.

Periodic regulatory review can be an essential process for increasing the integrity and equity of student aid programs. Regulatory review is also a vital mechanism for bringing about constructive federal, state and

institutional change. Regulations spell out in elaborate detail just what procedures must be carried out in assuring the accurate awarding of student aid dollars. However, to date, no review has been conducted with an emphasis on assessing impact on women.

It is also recognized that regulatory burden is continually a concern to university presidents and student aid administrators. In fact, increased federal student aid regulations have forced university administrators to shift funds from instructional programs to administer federal programs.[6] In a study of the cost to deliver student financial aid on campus, financial aid directors have expressed high levels of frustration with the regulatory process and its impact on financial aid operations. Their specific areas of concern included year-to-year changes in regulations, verifying satisfactory progress, validation of income for Pell Grants and verification of selective service registration.[7]

Regulatory review can improve equity and improve administrative efficiency. Any federal student aid programs, and thus its regulation, is a product of interpersonal and interinstitutional relations among legislators, federal officials, higher education lobbyists, postsecondary administrators, state higher education executive officers, students, among others. Regulation as well as deregulation reflects the ideas, rational or not, resulting from these interactions. The politics of regulation involve the processes of determining goals, resolving or managing conflict, setting standards and enforcing policy.[8] Regulatory politics are known to follow different patterns, mobilize different actors, and had different consequences depending, among other things, on the perceived distribution of costs and benefits of various policies.

The following regulatory reviews of the Title IV programs have been based on the principle of "equity packaging" as recommended by the 1975 National Task Force on Student Aid Problems, chaired by Francis Keppel, former U.S. Commissioner of Education. Based on the assumption that federal student aid is intended to increase access, choice and retention, the notion of equity packaging merely provides an equal running start for women. This principle is based on two premises: (1) that students with lesser resources from parents and other sources not requiring employment or borrowing have a greater claim on scholarships and grants than do those who already have those resources available to them, and (2) that scholarships and grants should be distributed in such a way as to equalize opportunity rather than to perpetuate existing inequities caused by birth or inequitable access to other resources.[9]

FEMALE PARTICIPATION IN STUDENT AID PROGRAMS AUTHORIZED BY THE HIGHER EDUCATION ACT OF 1980

The following examination of female participation in federal student aid programs addresses the following: (1) summary of major issues, (2) regulatory review of policies restricting and facilitating female participation in postsecondary education, (3) average freshman awards by income catetories, and (4) participation rates by type of institution.

PELL GRANT PROGRAM

Issues of concern for women participating in the Pell Grant program, include the definition of independent student, the determination of child care costs in calculating cost of attendance and the average award per recipient is less that that of males. The Pell Grant Program, the largest federal student need based aid program in terms of both dollars appropriated and the number of students served, was designed by Congress to provide students with a "floor" of financial aid to help defray the costs of postsecondary education. This support takes the form of entitlement grants which serve as the foundation upon which other aid is based. For academic year 1982 - 83, Congress had intended that the maximum award would be $2,100 and that this basic grant was to cover 55% of the cost of attendance.[10]

Analysis of Participation Rates and Average Awards

An important measure of effectiveness of the Pell Grant is the degree this award provides a floor of support for financing access to postsecondary education. An estimate of this effect is obtained by compairing the amount of the award to the cost of education. However, during the past year, females have received an average award of $880 while males received an average award of $913 (see Appendix I-1). The Pell Grant average award tends to be even lower for females in the top twenty academic rank. This award for both of the sexes covered only about 16 percent of total cost of attendance. The lower average award received by females indicate that they are attending lower cost institutions.

An analysis of both male and female participation rates by type of institution indicate a noticeable decline for low and moderate income individuals since 1980 (see Appendix G-3). Females tend to have a higher percentage rate of participation in the Pell Grant Program (25.5 vs. 22.8 percent). While the decline for moderate income levels was similar for both males and females, the rate of decreased particiation rates for low income females (13.3%) was about twice that of low-income males (8.5%) (61.8% to 48.5% for females and 54.9% to 46.4% for males). The Higher Education Research Institute at UCLA reports that for minority students, the Pell Grant Program "seems to have contributed more to increasing access than to increasing choice, since the great majority of recipients are enrolled in lower-cost institutions. Although the awards are higher for students who attend higher-cost institutions, they cover a smaller proportion of the total costs of such schools". [11]

Analysis of Pell Grant Regulations

Major policy issues of concern to women participating in the Pell Grant Program includes the definition of "independent student" and the calculation of child care costs in the determination of cost of attendance. Separate formulas are used for dependent and independent students, which take into account parental and student income, assets, family size, and number of family members in postsecondary education. The Secretary of Education submits to Congress each year for approval a schedule which provides the formula for determining a student's EFC (Expected Family Contribution). The

amount of a student's Pell Grant entitlement is equal to the lowest of (1) the maximum award ($1800 in FY 82-83) minus the expected family contributions; (2) one-half the cost of attendance which includes actual or average tuition and fee charges, actual or average room and board charges or a standard $1,100 living allowance and a miscellaneous allowance of $400 or (3) the difference between cost and expected family contribution.

The Education Department's annual evaluation of the Pell Grant Program reports a large growth in the percentage of "independent" recipients after 1975-76 and that the implementation of the Middle Income Student Assistance Act (P.L. 95-566) in 1979-80, caused a substantial shift in the distribution towards middle income dependent students. The number of dependent Pell recipients from families below $12,000 decreased since 1976 and the remaining dependent and independent recipients showed a large increase.[6] The College Board has also reported that "With total Pell appropriations and maximum grant levels not fluctuating greatly, high inflation pushed families into income levels that made them ineligible for aid, even though their real income might not have gone up much, if at all".[12]

Current regulatory provisions do not explicitly allow for child care costs in determining cost of attendance. The regulations simply provide that "Besides tuition and fees and room and board, allowable costs of attendance includes an allowance of $400 for books, supplies, and miscellaneous expenses for an academic year". At present child care expenses may be included only under the category of miscellaneous expenses and it is well known that $400 will never cover legitmate child care expenses to allow a women to finish even one semester of courses.

COLLEGE WORK STUDY

Major issues of concern relating to the participation of women in CWS is the rate of pay for female vs. male and the effectiveness of the Job Location and Development Program/Impact on Women Several studies have suggested that women may rely more on work-study aid than men in their aid packages, but when they do receive work-study aid, men get the higher paying jobs.

The College Work-Study Program provides jobs for students who have financial need and must earn a portion of their educational expenses. Students may work on a part-time basis either on or off campus and in some instances students work full-time off-campus. The institution is responsible for developing jobs under the program and, in the case of off-campus employment, the work must be in either a public or private non-profit setting. Institutions are encouraged by law to use College Work-Study employment to compliment the educational or vocational goals of students to the maximum extent possible, however, it is not known how successful this is for women. In regions with high unemployment rates, it may be worthwhile to consider expanding CWS programs to retrain women. Expanding the utilization of CWS funds for part time students should be considered.

Institutions may at their discretion use up to 10 percent of their College Work-Study allocation for less than half-time students. While working hours are generally limited to 20 hours per week while classes are in session and 40 hours per week during the summer and vacation periods, institutions are free to set their own limits on working hours. Up to 80 percent of the student's wages are paid by the institution's federal CWS allocation and the remaining 20 percent, plus additional employer costs, are paid by the school or the off-campus employer. Work-Study students may be paid at variable rates depending on the type of work performed and the skills and experience necessary to perform the job.

Analysis of Participation Rates and Average Awards

Average amount received under both federal and non-federal college work programs indicate sex related differences. Tabulations on students in the top twenty academic rank of their high school graduating class utilizing Freshman Norm surveys show that while the percent of women participating in College Work Study is higher than that of men (16.5 vs. 13.8 percent), the average award received is less than men ($753 vs. $830), and this award covers less of the total college costs than men (13.74 vs. 14.65).

The National Center for Education Statistics has reported that the most common activity of 1980 seniors was full-time employment. Of those students entering the labor force, women were much less likely to obtain full time employment. Thirty-eight percent of the women were employed full time in October, 1981 compared to 49% of the men. However, women were more likely to be employed part time (28 vs. 20 percent) and more likely to be unemployed and looking for work (10 vs. 8 percent).

In a study of work patterns of full time college freshmen, John Lee has found that there does appear to be a tendency for men who work to report

working more hours a week than women. This gap narrowed in 1981.[13] However, this study was not able to determine whether wage rates or job placements were comparable because the data is not sufficiently available. The Higher Education Research Institute has furhter found that participation in College Work Study contributes to greater persistence in completing college, particularly for women.[x]

Other analyses of participation shifts in CWS, utilizing data from the High School and Beyond Survey, indicate that both women and men have decreased participation in CWS across all categories of institutions, except for females attending public 2 year schools. For this type of institution, low-income females increased their participation from 8.6 percent in 1980-81 to 14.1 percent in 1981-82. This shift mainly reflects not only increased enrollments for community colleges, but also low-income women switching from CETA programs to CWS programs.

Analysis of CWS Regulations

The most significant issue of concern for women is that there is no regulatory provision requiring equal pay for equal work. At the graduate level women may be receiving CWS funding and be classified as college faculty. These positions are seldom, if ever tenure track positions.

The CWS Maintenance of effort requirement (46 CFR 675.20) provides an opportunity for institutions to increase their own aid programs for women. To meet this requirement, an institution may include any expenditures of its own funds for scholarships, grants, loans, tuition waivers, fee waivers, and fee remissions. The institution may also include its employment of graduate and undergraduate students, whether or not they are eligible for the SEOG or CWS program. The maintenance of effort requirement may also be met by utilizing any funds donated to the institution for student financial aid if the institution chooses the recipients and the award amounts.

Institutions need to become more aggressive and creative in making use of the College Work Study program to provide for graduate students. Further, as this program is being proposed for greater expansion and to fulfill greater self help requirements, it becomes imperative to examine closely the equity issues, since the widest gender differences appear in college work programs.

GUARANTEED STUDENT LOANS

The Guaranteed Student Loan Program assists students in securing loans that help them finance their postsecondary education. No loans are actually made by the Federal Government, instead, the loans are actually made by a variety of lenders to encourage their participation in the program, and it makes interest subsidy payments on behalf of students until those students begin repaying their loans.

Information on those who borrow under GSL is not sufficiently available, however research does seem to indicate four major issues impacting the participation of women in GSL programs: (1)lender discrimination, (2)high tendency to enter default and bankruptcy status, (3)hidden demand for loans, and (4) child care costs are not explicitly allowed for calculating cost of attendance. Because of high tuitions and sizeable self-help requirements, the need for loans at many schools is large and growing and women tend to rely more on loans, because they have to. In the absence of sufficient grant and work study resources, it is increasingly necessary for women to incur large college debts if they want to complete school. Moreover, many women decide to pursue graduate education, further adding to individual debt burdens. Also, women may borrow smaller amounts than needed from more costly sources.

Analysis of Participation Rates and Average Awards

Public hearings have noted that legislative changes enacted by Congress as part of the Omnibus Budget Reconciliation Act of 1981 have resulted in a 22 percent decline in both the number and amount of new loans made in fiscal year 1982 as compared to fiscal year 1981.[14] During Fiscal Year 1982 over 3.5 million students secured loans and over 90 percent of these loans were made by banking institutions and credit unions.

The participation rates of women in the Guaranteed Student Loan Program do not reflect enrollment rates and are disproportionately low, particularly in the low income categories. Low income women tend to receive GSLs at nearly half the rate of males. This disproportionately low participation among low income women shows up in both the Freshman Norm Survey and the High School and Beyond Survey (see Appendix H). Throughout the history of the Guaranteed Student Loan Program, charges of various kinds of discrimination have been made. Significant charges of lender discrimination have been found for students enrolling in proprietary schools. For example, in a survey of the fifty state guarantee agencies, The National Commission on Student Financial Assistance found that commercial and direct lenders are known to deny GSLs to students who: (1) have not had a previous customer relationship, (2) are out-of-state students attending schools in their state, and (3) plan to enroll in less-than-two year programs.[44]

Findings presented to the National Commission on Student Financial Assistance by the Credit Research Center at Perdue University has pointed out that women may be unwilling to commit themselves to student loans because of a low level of anticipated future income. This "hidden demand" for student loans from those entering underpaid professions raises important policy questions.

Research on loan burden has noted:

> On the one hand, some students may opt for a GSL, even though they recognize that their probability of repaying the loans are slim. Their ultimate defaults contribute to the public perception that students are taking undue advantage of the loan program. However, if demanding credit standards had been required of lenders, these loansprobably would not have been made. Given the lack of incentive for lenders to apply strict credit standards, these 'loans' become de facto grants. On the other hand, many students (whose numbers cannot be measured) use self-restraint and do not borrow under the government student loan programs. They may borrow smaller amounts than needed from more costly sources, work part-time (possibly with an unfavorable effect on their academic record), or change their course of study. Rather than give defacto grants to risk-taking students and none to the financially cautious, it may be preferable for both governments and universities to channel grants on the basis of ability (not need) to students entering predominantly female professions and to provide the loan funds to those whose selection of educational programs and profession create an ability to repay these loans. Were this approach to be adopted, the default rates on student loans would decline and outstanding students entering nursing, teaching, and social work would be more equitably treated and avoid tarnishing their credit records.[15]

Analysis of GSL Regulations

Congress and Department of Education officials have focused much of their attention on rising defaults and the willingness of student borrowers to repay, but little attention has been given to the critical question of ability to repay. The ability to repay is a function of both the size of the debt and the repayment requirements in relation to the borrower's income over the term of the loan.[14] Chapter III has provided more detailed information on defaults and bankruptcy claims on the part of women. The issue of disproportionate adverse impact of GSL defaults and bankruptcies on women necessitates a close examination. It has been estimated that 1984 GSL bankruptcy claims will increase by nearly $3 million, from $21,200,00 in 1983 to $24,100,00 in 1984, for the U.S. Department of Education. Further, the GSL bankruptcy subsidy costs continue to rise. In 1982 the Department paid out $14 million for bankruptcy subsidies compared to $9 million in 1978.[15]

Another policy issue under GSL is that a commercial lender does not have to state the reason for loan denial so that students may receive a loan from an alternative source. Further, no loan forgiveness options are available.

NATIONAL DIRECT STUDENT LOAN

The oldest of the major federal program, the NDSL Program (formerly National Defense Student Loan) is of greatest value for women because it is the only program providing the Teacher Cancellation Program, the Head Start Cancellation Program and loan repayment extension provision for low income individuals (see Appendix F). This program provides a flexible campus-based source of low-interest loan funds available to both graduate and undergraduate students based on their financial need.

Reflecting its post-Sputnik origins, NDSL was at first designed to encourage students to enter public school teaching through its loan forgiveness features. However, as circumstances changed so did NDSL, and it now offers special encouragement through cancellation only to those teaching in economically deprived areas or to those teaching the handicapped.

As in the other federal student aid programs, the funds must be used solely to meet educational and related expenses. Students must enroll at least half-time at an eligible school, and they must demonstrate financial need in order to receive the loan. Loans are made from an institution's revolving loan fund consisting of a Federal capital contribution. This is matched by a ten percent institutional contribution and is substantially increased by collections from prior loans. These revolving funds held by institutions are intended to provide low-interest loans to needy students who have difficulty obtaining Guaranteed Loans or who need additional loan capital. Distribution of new captal is based on state appropriations, regulatory criteria of institutional need for funds, as well as institution collection performance.

Analysis of Participation Rates and Average Awards

Students may borrow up to $2,500 for the first two years of an undergraduate program, up to a cumulative maximum of $5,000 for an undergraduate course of study. Graduate students may borrow a maximum of $10,000, minus any amount borrowed as an undergraduate. An examination of participation rates indicate an equalization of average award per recipient, percentage of total cost covered, and percentage of students participating (see Appendix I-4). Thus, this program is especially helpful for women.

However, the NDSL funding level has dropped by $107 million since 1980, thus serving 100 thousand fewer low-income students. Further, The U.S. Department of Education has cut off NDSL funding to institutions where the default rate is above 25%. Another look should be made on this issue. As one university president has noted, "The current practice of eliminating new capital contributions to institutions above the 25% benchmark penalizes needy students and not the institutions. New and continuing students who qualify for and need NDSL awards to complete their educations are not the cause of the past default rate problem. Yet they are the ones who will pay the price when institutions are precluded from receiving capital contributions under the program. Congress should not permit needy students to be forced to pay the price for what may have been past institutional deficiencies regarding collection efforts".[16]

Analysis of NDSL Regulations

Students must be enrolled at least half time in order to receive an NDSL. This requirement impedes the participation of women, especially atcommunity colleges and proprietary institutions where women not only have high rates of less than half time enrollments, but also it is these institutions which have been found to have high rates of GSL denials. The NDSL interest rate is five percent compared to eight percent for a Guaranteed Student Loan, thus having a particular advantage for women.

Recent efforts to abolish the Teacher Cancellation Program would have a devastating impact on women.

SUPPLEMENTAL EDUCATIONAL OPPORTUNITY GRANT

The Supplemental Educational Opportunity Grant Program (SEOG) program serves approximately the same income population as the Pell Grant program, and is especially critical for students with higher cost of attendance such as those attending independent institutions, and of particular concern to women - those who are independent students with dependents. The SEOG program channels grants to students through the institutions, usually as part of a financial aid package, to supplement the resources of students whose financial needs are not met through other sources of aid.

Funds are distributed by statutory formula first to states and then to institutions within the state. Institutions qualify for funds based on past utilization, current student finances, and funds alloted to the state in which the institution is located. The state allotment is based in part on its relative share of national part-time and full-time undergraduate enrollment.

Analysis of Participation Rates and Average Awards

A recognized advantage of SEOG is that it has been able to meet the special circumstances and needs of the individual student, and since it is campus-based, can be used as an effective recruitment tool for the institution.[16] SEOG offers the financial aid officer flexibility in designing student aid packages and this grant program has been directed increasingly at reaching students at institutions of high cost (see Appendix H-8). The maximum grant authorized per student for a single academic year is $2,000, however, the participation rates of low income females attending private 4-year institutions are lower than comparable males (24.7 percent vs 35.6 percent of enrollments).

The American Council on Education has reported that approximately 70 percent of recipients come from families with incomes below $15,000 and over 80 percent also receive Pell Grants. Students at independent institutions receive over 40 percent of SEOG funds. Due to shortages of SEOG funding in 1981 - 82, only half of Pell Grant recipients in independent institutions and less than 20 percent of Pell Grant recipients in public institutions received an SEOG.[17] Participation rates for moderate and high income females tend to equalize or slightly exceed that of their male counterparts, although, the participation rates of low-income males and females have droped substantially while the participation rates of moderate and high income students appears to have stabilized (see Appendix H-8).

An anlysis of the distribution of average awards in SEOG, the only federal campus-based discretionary grant program, indicates that high achieving males tend to receive larger grants compared to high achieving females (see Appendix I-5).

Analysis of SEOG Regulations

Institutions at their discretion may use up to ten percent of their allocations for less than half time students.

STATE STUDENT INCENTIVE GRANT PROGRAM

No other federal student aid program has more regulatory flexibility and possesses greater potential for adapting to the needs of women than the State Student Incentive Grant (SSIG) Program. ~~(See Table 34)~~ SSIG was created to encourage the establishment and expansion of state scholarships to undergraduate postsecondary students with substantial financial need; program operations vary from state to state according to the size and maturity of scholarship programs managed by the individual states. Through providing incentives for states to establish or expand their own state scholarship programs, SSIG's program strategy has helped to create a nationwide delivery network of state agencies and officials to focus on student assistance. Further, the state sector has been developed into an integral part of the total student financial aid picture.[18]

The maximum SSIG award is $2,000 per academic year which is reduced for less than full-time attendance. Institutions may, with the approval of the state agency, use any proportion of the payments received in any fiscal year for less than half-time students who are otherwise eligible. While the same general eligibility criteria apply for SSIG that apply to other federal student aid programs, the states have the flexibility of determining eligibility standards and establishing lower maximum awards in view of their own fiscal and constitutional restraints. Further, SSIG is the only program where the federal dollar can indeed function as a wedge for increasing contributions on the part of state, institutions, and private sector as well as for state capacity building.

A current priority emphasized by the U.S. Education Department for SSIG is that of developing and expanding state funded work study programs.[19] Many states have taken further initiatives to solicit corporate matching dollars, not only for state work programs, but also for various state scholarship and grant programs. Governors[20] and state legislators[21], having recently become more involved in student aid policy, are especially in pivotal positions for improving student aid opportunities for women.

Several states have recognized the needs of women not only in public policy and the distribution of scholarship and grant dollars but also by piloting creative initiatives in financial aid which further reduces financial barriers for women. Michigan is one of the few states which explicitly prohibits sex discrimination in the distribution of scholarships in state legislation.[22] Illinois reports that over 50 percent of dependent applicants were women and of the independent applicants, 66 percent were female and over 74 percent were 22 years of age or older. However, information on the amount of dollars women receive is not reported. The Illinois General Assembly has also passed legislation creating a "student to student program" by which matching grants go to a scholarship fund established from voluntary contributions by students.[23] The Massachusetts Higher Education Assistance Corporation has targeted student loan programs to helping low-income women get off public welfare programs.[24]

The Education Department's 1982 annual evaluation report of SSIG indicates that in essence state funds appear to be distributed on a basis of need similar to the SEOG and Pell Grant programs. There is one difference: state funds as distributed appear to be more sensitive to the ability level of student recipients. Those students with the greatest need and highest

ability have the highest chances of receiving state aid. It has been found that students in the upper third of ability, as measured by high school rank, received almost double the percentage of awards as those in middle and lower thirds. While similar distribution patterns were observed in terms of need, states also were able to consider academic potential.[25] An analysis of aid distribution indicates that women receive state scholarships and grants on a fairly equal basis when compared with men; though it tends to be a little less, it is not significant.(See Table 35)

SSIG impact studies by the National Association of State Scholarship and Grant Programs have noted the success of this program in that at least 26 states have matched their increased SSIG funding on about a six to one basis.[26] In addition, SSIG funds have contributed to the establishment of new programs in 21 states and contributed to the growth and expansion of programs in seven of those states. Among the 25 states with larger, older programs, SSIG funding levels have been associated with program growth and expansion and, among five states with older, smaller programs SSIG funding made significant contributions to program growth in three states. Janet Hansen, an associate director for policy analysis with the Washington Office of the College Board and one who has carefully studied the impact of SSIG since the passage of the original legislation cautions that SSIG has been less successful in inducing increased state spending. This has resulted in large part because federal expenditures fell short of matching many states' efforts and this finding remains true today. She states, "in fact, declining federal appropirations threaten to erode SSIG's influence on the expansion of state programs altogether. . . .In a time of extreme budgetary pressures on state governments, encouraging the continuation of current spending on state grants might be an important new effect of SSIG".[27]

VI ROLE OF THE FEDERAL GOVERNMENT IN ENCOURAGING WOMEN TO PARTICIPATE IN POSTSECONDARY EDUCATION THROUGH STUDENT FINANCIAL ASSISTANCE

In spite of proposed cuts over the last couple years, Congress has reaffirmed four distinct purposes of the federal role in education: (1) to finance high cost programs of overriding national significance; (2) to finance the needs of special categories of students the Congress believed were not receiving the attention they deserved at the state and local levels; (3) to advance the cause of civil rights; and (4) to serve as a liaison and clearinghouse for educational research. In fact, the federal government has added a new purpose to the federal role: to provide leadership on a national scale with an emphasis on educational excellence.[1] Certain traditional federal functions which serve national purposes such as research, development, dissemination, evalution, and the provision of technical assistance should be maintained for women's educational equity programs. However, the U.S. Department of Education has issued no guidance on how these federal role functions should support sex equity,[2] and any goal to provide educational opportunity for women is not mentioned in the Secretary's "Goals and Performance Priorities of the U.S. Department of Education for Fiscal Year 1984".[3]

Many federal women's projects which are currently fragmented throughout the government should be consolidated, coordinated and improved to provide for and assure greater opportunities for women to complete a postsecondary education. A 1978 study on women's projects by the Fund for the Improvement of Postsecondary Education has concluded that there is a severe troubling aspect to the increasing differentiation and specialization of women's projects. It notes that "programs have become more fragmented, each guarding its own piece of turf. . . .Women's projects have become increasingly isolated from each other. . . .This 'balkanization' has led to a situation in which women have begun to pit themselves against each other for support and external funding. That each of these groups needs the other has gotten lost in the rush to define goals, get funds and stimulate change".[4] Any observer of women's education equity can well note that the continuation of this fragmentation has resulted in no cohesive federal policy, deep cuts in funding and staff, and virtually no coordination among existing women's equity and advocacy groups in 1983. Granted, there are sharp differences of opinion on such issues as ERA, abortion and political philosophy. However, the equalization and advocacy of increased student financial assistance for women is at least one issue in which women's groups of all political perceptions agree.

The Congressional Caucus for Women's Issues states, "People who are concerned about the economic status of women must be concerned that ensuring that women have the same access to higher education that men do. . . .We do know that among freshmen, 19.4 percent of the women expressed major concern for financing college while only 14.9 percent of the men did. In predominantly black colleges, 32.5 percent of women had major concern, compared to only 23.9 percent of men."[5] The National Federation of Republican Women in the Republican National Committee state, "Of course women have a greater stake than men in government programs. They have children to

feed, and most of these working mothers' incomes hover around the poverty level. They also live longer than men, and depend more on the Social Security blanket. . . .The women's revolution in this country was about independence: the freedom to choose her own career, her own life style, freedom guaranteed not only by the law but by a healthy economic climate".[6] Their solutions to overcome the "politics of dependency" include helping to place or retrain unemployed women and helping women return to school.[7] The National Resource Center on Sex Equity has declared that, "Access to vocational opportunities, fairly restricted for disabled students generally, appear to be further restricted for disabled women. . . .Bureau of Census statistics show the mean earnings for disabled women to be $5,835 as compared to $13,363 for disabled men. Disabled women are almost twice as likely as disabled men to be unemployed".[8]

It is important for women's groups representing Democratic and Republican points of view, as well as representing higher education, vocational education and elementary and secondary education to unite for advocacy on student aid. A review of current federal programs on women's education equity indicate the following major functions for promotion of student financial assistance.

RESEARCH

The National Institute of Education has funded many research projects for identifying social processes that facilitate or inhibit the learning and achievements of women throughout postsecondary education. Major content areas have included: (1) women in mathematics and science, (2) sex equity in careers and employment, (3) sex equity in elementary and secondary school practices, (4) women with special needs, (5) women educators, (6) women and minorities in higher and continuing education, and (7) general projects on sex equity.[7] Substantial research has made some very definite conclusions on the social processes underlying educational inequities for women after high school graduation, and as a result of NIE projects many institutional practices which have served as barriers to women have now been removed. However, National Institute of Education support for sex equity has almost disappeared since 1980 along with staff responsible for this area. The Women's Research Team in Teaching and Learning (T&L) and the Minorities and Women's Program in Dissemination and Improvement of Practice (DIP) have been dissolved.[8]

ADVISORY COUNCILS AND COMMISSIONS

Several national advisory councils, commissions and task forces are currently in place to examine and provide recommendations on many postsecondary education policy issues. However, there is a critical need for all advisory councils to assert more leadership in the area of student financial assistance and in women's education equity. For example, the 1983 annual report of the National Advisory Council on Women's Educational Progrms has reported that 103 grants have been awarded for postsecondary education since fiscal year 1976, however, student financial assistance is not included as a subject category.[9]

FUNDING FOR CAMPUS-BASED PROGRAMS/EDUCATIONAL EXCELLENCE

The Women's Education Equity Program and the Fund For the Improvement of Postsecondary Education have been two major discretionary programs within the U.S. Department of Education providing funding for various projects designed to promote student financial assistance for women. Most of these projects,however have focused on program development rather than direct assistance to individual women or research and development projects in the area of student financial assistance.

PROGRAMS FOR THE DISADVANTAGED

The Special Services Grants for Disadvantaged Students Program, currently operating under Title III, should be extended across all institutions to serve women - not just predominantly black colleges. Such a program should be set up similar to the requirements in the current Title III program. That is, every institution of higher education receiving a Special Services grant has to assure that each participant enrolled in the project will receive "sufficient financial assistance to meet that participant's full financial need". It is incumbent upon the project to work with the participants and the institution to see that this assurance is met".[9] The 1981 - 1982 national summary report for the Special Services Program for the Disadvantaged reports that this federal program is of particular importance to women in that it served 104,696 women and 76,672 men throughout the fiscal year. In spite of impressive numbers, the national average amount received was only $352.[10] It is not reported the average amount received by women versus men, but on the basis of most other federal programs, one cannot help but suspect that women may be receiving less than men in this program also.

The Educational Opportunity Centers Program currently operating under Title III can also serve as a model for a women's program. As currently operating, this program provides Federal financial assistance to establish and operate Educational Opportunity Centers. Each center is designed to provide participants with: (1) Information concerning financial and academic assistance available for individuals desiring to pursue a program of postsecondary education. and (2) Assistance in applying for admission to institutions at which a program of postsecondary education is offered, including preparing applications for use by admissions and financial aid officers.[10]

INFORMATION DISSEMINATION AND TECHNICAL ASSISTANCE

SCHOLARSHIPS, ASSISTANTSHIPS, FELLOWSHIPS, AND STIPENDS

Many fellowship programs exist throughout the federal government to recruit talented individuals to areas where there is great national need and concern. Recently, the National Science Foundation has announced awards for visiting professorships for women. These awards are "designed to help make full use of the nation's scientific and technical resources by encouraging women to develop careers in science and engineering research".[11] Several fellowship programs operate in discretionary programs administered by the U.S. Department of Education such as Indian education, Bilingual education and special education, and talent search.

JOB TRAINING

Improving overall national productivity has been found to be definitely in the federal and national interests and colleges can play a vital role in promoting and improving job opportunities for women in cooperation with federal efforts. Besides the College Work Study Program, women may receive student assistance through such programs as the Job Training Partnership Act, Cooperative Education, and The Vocational Education Act which provides authorization for vocational education sex equity stipends

Cooperative education, authorized under Title VIII of the Higher Education Act of 1980 and administered by the Office of Vocational and Adult Education in the U.S. Department of Education has provided 1,054 grants totaling almost $35 million to postsecondary institutions to develop, implement, strengthen or expand work programs. These programs have been found to contribute to a more direct relationship between college major and full-time after graduation employment.[12] The majority of students enrolled in cooperative education programs are compensated for their work, thus, the income may be viewed as another form of student financial assistance. It is recognized that this program holds much potential for women to improve job skills, yet national statistics on the participation of women in cooperative education are not collected.

The Vocational Education Act of 1976 has four major purposes, one of which is the elimination of sex-role stereotyping in occupational training. It also calls for the reduction of sex bias in vocational education programs and the money allocated to the Vocational Education Act is distributed at two levels - state and federal. Under the act, organizations interested in securing support for sex equity projects of national significance in vocational education can respond to requests for proposals to win a contract based on Office of Vocational and Adult (OVAE) needs and yearly initiatives. Among the priority targets in 1979, one designated need was for programs designed to attract women into nontraditional occupations. Programs funded included projects to credential women's life experiences, to address the vocational needs of women offenders, to facilitate employment of displaced homemakers and to develop a support service system for sex equity services in vocational education. In 1981 a project with the National Academy of Sciences, the Carnegie Corporation of New York, and the Department of Labor was funded to focus on the issue of job segregation by sex.

VII. PARTICIPATION OF WOMEN IN THE FEDERAL STUDENT AID POLICY DECISIONMAKING PROCESS

An ultimate issue affecting the impact of federal student aid policy on women is the extent to which women substantially participate in decisionmaking and hold leadership positions invested with authority as well as responsibility. Federal policy development for student aid is an elaborate and multifacet maze involving congressional committees, The Council of Economic Advisors, several offices throughout the U.S. Department of Education, state guarantee agencies, Sallie Mae, the U.S. Office of Management and Budget, The U.S. Treasury, The Internal Revenue Service, The Federal Reserve, national higher education organizations, among many others. Federal student aid formulas, available funds, eligibility criteria, and application procedures tend to change each year as new economic, political and educational forces struggle for control of student aid policy. Each year, many of these major changes have been made without the recognition of potential adverse impact on women. An inside look at the decisionmaking processes within these powerful institutions reveal that women are hardly represented if they are represented at all. Too often, when women are appointed to decisionmaking positions or boards, it is only a discretionary inclusion of one or a few women only. Tokenism, a subtle form of discrimination against women, is too prevalent in the decisionmaking process for federal student assistance, the largest and most important federal education program for women.

CONGRESSIONAL COMMITTEES

All current members of the U.S. House Subcommittee on Postsecondary Education and the Senate Subcommiteee on Education are men. The House Committee has fifteen members consisting of seven Republicans and eight Democrats, while the Senate Committee consists of six Republicans and five Democrats.

FEDERAL AGENCIES

The Council of Economic Advisors

The Council of Economic Advisors provides advice to the President on a wide range of domestic and international economic policy issues which include student financial assistance and is responsible for preparing the annual Economic Report of the President. The 1983 report submitted to the President was prepared by a council consisting of no women. This Council has a chairman who is responsible for communicating the Council's views to the President and exercises the ultimate responsibility for directing the work of the professional staff in addition to two council members who are responsible for all subject matter covered by the Council, including direct supervision of the work of the professional staff.

In addition no top staff positions were held by women. These top staff positions consist of the Special Assistant to the Chairman, the Domestic Policy Economist and the International Policy Economist. In lower staff positions women comprise two out of a total of twenty-two. Staff titles include senior staff economist, statistician, staff economists and junior staff economist.[1] The severe economic plight of women is slightly

recognized in the economic report, but it is not discussed nor are any policy recommendations suggested. Student financial assistace, the largest federal investment in education which enhances economic opportunity for women, is not mentioned.

The Federal Reserve.

One institution, more than any other, controls the movement of money, prices, the economy, and the ultimate direction of federal student aid policy and that institution is America's central bank, The Federal Reserve. At the center of the process of monetary control is the Federal Reserve Board, a group of six men and one woman who have the power to control the growth of money throughout the nation. Members of the Federal Reserve Board are nonelected officials who are appointed by the President for fourteen years at a time. The Federal Open Market Committee is the supreme policy-making body of the Federal Reserve System.[2]

The Federal Reserve has wide-ranging controls over interest rates and inflation which impact, in particular, the costs to administer the Guaranteed Student Loan Program as well as costs of attending school. The decisions that are made on the various money-market indicators (e.g. T-bill rates, prime rate, bond rates, federal funds, mortgage rates, etc.) have a direct bearing on many aspects of federal student aid programs.[3] These aspects include the GSL special allowance ceiling, insurance premium, the in-school interest subsidy, in addition to the GSL and NDSL interest rates.

U.S. Department of Education

All top policy positions having responsibilities relating to student financial assistance are filled by men as evidenced in the panel presentation of policy by Department of Education Officials to the 1983 annual joint session of the National Council of Higher Education Loan Programs and the National Association of State Scholarship and Grant Programs.[4] These positions include Assistant Secretary for Postsecondary Education, the Inspector General, Director of Policy Analysis. Many women hold staff positions with much work responsibility, but no women working exclusively in student financial assistance hold top line policy slots.

At the other extreme of female appointments is noted in the seventeen member National Advisory Council on Women's Educational Programs in which the membership is all female. However, this council merely provides advice which is generally ignored and has never been involved in student financial aid policy development. In fact, when a request was made by the National Commission on Student Financial Assistance for a representative of the council to present testimony for a public hearing on the concerns of women relating to student aid, the response was that they were not permited to present such testimony.

U.S. Department of Justice

All attorneys representing the administration in the landmark Title IX case on student financial assistance currently before the U.S. Supreme Court in Grove City vs. Bell are men. The attorneys for the Justice Department include the Solicitor General, Assistant Attorney General, Deputy Solicitor

General, Deputy Assistant Attorney General, Assistant to the Solicitor General and Attorney.[5]

Federal judges deciding Title IX cases involving student financial assistance have been all male.

SALLIE MAE

Almost one-third of all students and their parents, who are in debt for college education, now have a single, somewhat unknown creditor to outsiders called Sallie Mae. This powerful national secondary market established by Congress in 1973 for servicing student loans made by financial and educational institutions, state agencies and other organizations is also referred to as The Student Loan Marketing Association. Sallie Mae raises money for colleges and banks to make student loans by selling notes and other kinds of debt securities to the public, then uses the cash to buy loans from lending institutions. Sallie Mae's 1982 annual report notes that net income for 1982 increased 109% from $18.0 million in 1981 to $37.8 million.[6] By the end of 1982 the corporation's network of 13 services managed $3.2 billion of loans, a 157% increase from $2.1 billion at the end of 1981.

Sallie Mae's 21-member board of directors which include seven presidential appointees, seven representatives of educational institutions, and seven representatives of financial institutions consists of only one woman, who is not a member of the executive committee of the board of directors. Further, the position of chief executive officer and all ten top policy-making, vice-president positions are held by men. These policy areas include finance and administration, general counsel and secretary, marketing, personnel and administration, loan servicing, corporate development, controller, internal auditor, corporate finance, corporate services and deputy general counsel.[7]

HIGHER EDUCATION ORGANIZATIONS

Since student aid programs are the most significant federal investment in higher education several education organizations focus exclusively on student aid while others hire top lobbyists who are extremely knowledgeable in all facets of student aid. Among the more powerful of these groups are the National Council of Higher Education Loan Programs (NCHELP), the National Association of State Scholarships and Grants (NASSG), the National Association of Student Financial Aid Administrators (NASFAA).

NCHELP, the organization of leaders in state guarantee agencies, has no women on its 1983-84 executive board which consists of twelve people. Even though the NCHELP Washington office is directed by one of the top female attorneys in Washington politics, she has no final decisionmaking authority. The eighteen member executive committee for the National Association of State Universities and Land-Grant Colleges (NASULGC) has only one woman. NASULGC is the largest organization which represents public institutions of higher education. The advisory panel to the Washington Office of the College Board consists of eleven individuals, none of whom are women. Representatives to the advisory panel are mainly university presidents and other nationally recognized higher education leaders. The National Collegiate Athletic

Association is also contolled by men.

The American College Testing Program (ACT) which provides extensive student financial need analysis services (SNAS) has no women in executive management positions. More than 4,000 institutions and agencies use SNAS in the award of institutional, state and federal financial aid. This service collects financial information on Family Financial Statements (FFS), analyzes the data, calculates need for assistance, and sends reports to the student and family and to the institution and agencies designated by the student. ACT's governing bodies include only 4 women on the 37 member ACT Corporation and 2 women on the 17 member board of trustees.[8]

WOMEN IN BANKING AND COMMERCIAL LENDING INSTITUTIONS

A recognized dimension in the politics of federal student aid programs, is that in the end, the bankers will rule, despite the efforts of educators, college associations, and student aid specialists. Bankers have had tremendous influence in shaping federal loan policy and securing their own profit margin, for they have the trump card. Most of the captial remains in their hands, and they can, as has happened, simply curb their participation if dissatisfied with the terms of federal legislation or regulation. Ed Elmendorf, Assistant Secretary for Postsecondary Education in the U.S. Department of Education, has noted the substantial GSL loan volume created by multi-state lenders such as Chase Manhattan and Citibank. Besides commercial banks, other small banks, thrift institutions and credit unions account for 25 percent of GSL lenders. Further, direct state lenders, which are the primary lenders in many states, represent over 7 percent of the nationwide total for new loans in fiscal year 1981.[9] It is well known that women do not hold president or vice president positions in banks. (Get numbers from ABA)

WOMEN AS INSTITUTIONAL STUDENT AID ADMINISTRATORS

The latest national survey of the National Association of Student Financial Aid Administrators (NASFAA) has found that women "are somewhat more likely to occupy entry or lower-level positions in financial aid" at postsecondary institutions.[10] In 1981 71.5 percent of campus student aid counselors are women compared to 40 percent of student aid directors being women and women are more likely than men to be employed at private institutions (45.1 percent at private institutions vs 35.1 percent at public institutions). In spite of increasing numbers of women working as student financial aid directors, the position of student financial aid director is generally not recognized as a top administrative position in most institutions.

Sixty three percent of the NASFAA respondents reported that they work under the student services organizational structure and it has been found that "salaries of aid administrators historically have been lower than those of other postsecondary institutional administrators" and lower-level aid administrators were much less likely than directors of financial aid to believe that their salaries are adequate in comparison to those earned by others at their institutions." Further, respondents holding lower-salaried

positions of associate or assistant director, which are predominantly women (58.9%) "were less likely than others to indicate that they were recognized as having important positions," and lower-salaried directors "were less likely than others to indicate that they had enough authority to do their jobs".[11] The College and University Personnel Association has reported that the 1983 annual average salary for male student financial aid directors was $27,500 and for female directors the average salary was $20,800.[12]

NEED FOR WOMEN TO DEVELOP PERSUASIVE LEADERSHIP SKILLS FOR IMPACTING STUDENT AID POLICY

An overlooked, and perhaps most important recommendation made by The National Commission on Excellence in Education was that of stressing "the distinction between leadership skills involving persuasion, setting goals and developing community consensus behind them, and managerial and supervisory skills".[10] Although the latter are necessary it is important to consciously develop persuasive leadership skills if reforms are to be achieved. Persuasive leadership requires developing skills in networking, negotiating, consenses building, risk taking, group processes, and influencing. At the same time effective utilization of these skills is dependent on a high degree of knowledge of and commitment to any particular issue as well as having a commanding understanding of and ability to implement basic organization development principles. .

Women advocates and advocacy groups must become more knowledgeable of and active in what may be called the "student financial assistance cultural network" which looks considerable different from formal organization charts. In fact, organization development research has suggested that 90 percent of what goes on in an organization has nothing to do with formal structure or events. The real business goes on in the cultural network[11] which is actually the primary informal means of communication within and among student aid decisionmaking groups and individuals. Improved networking strategies are critical informal systems of checks and balances to gather and disseminate information and to influence decisions.

Federal decisions relating to student financial aid policy involve so many federal agencies, congressional committees, education lobbying groups, and higher education institutions that student financial aid decisionmaking and persuasion in and around Washington must finally be based on caring enough, being courageous enough and trust.[12] Student aid policymakers should consider the hard lessons learned from the pathological extreme of Washington decisionmaking - Watergate. One research effort on Watergate as a case study in management concluded:

> An analysis of Watergate can be discouraged or misled by the very richness of its pathology. So many people at so many levels in and around the White House made so many different kinds of mistakes that the observer is first tempted to say that this was the stupidest lot of managers ever assembled. . . Those who viewed the parade of witnesses before the Erwin committee knew they were listening to intelligent men. Management analysis of Watergate, then, must turn upon the question of why officials, whose ability ranged from average to very high, made

so many mistakes. . . .These ventures would remain forever incomprehensible unless we turned to the beliefs and emotional patterns of the participants. Their attitudes were shaped in part by the general ambience that enveloped the White House and the Committee to Re-elect the President, and that ambience included a lot of fear, suspicion, and hostility.[13]

VIII. NEXT STEPS FOR IMPROVING WOMEN'S EDUCATIONAL AND ECONOMIC OPPORTUNITY THROUGH FEDERAL FINANCIAL AID PROGRAMS

FEDERAL OFFICIALS

ENFORCE TITLE IX CIVIL RIGHTS PROVISIONS RELATING TO STUDENT ASSISTANCE

- Require that student financial assistance be classified as federal aid to the institution, rather than as program specific aid.
- Withold federal funds from institutions, found to be non-compliant with Title IX student assistance provisions.
- Add the category of student financial assistance to the list for postsecondary education compliance reviews in the Office for Civil Rights and itemize these reviews in the OCR annual report since student aid is a major section under Title IX.
- With current trends of reductions in participation rates and dollar amounts available for financial aid and rising college costs, both research and accountability studies on attrition and retention will become extremely important in the next few years.

PLACE WOMEN'S EQUITY FUNDING PRIORITIES ON THOSE PROGRAMS HELPING WOMEN TO COMPLETE POSTSECONDARY PROGRAMS THROUGH STUDENT ASSISTANCE.

- Reward excellence in institutional practices which increase student aid for women, and provide services for women, so as to lower total cost of attendance. (i.e. providing child care facilities.)
- Increase scholarships, stipends, grants and internships for minority women, displaced homemakers, re-entry women and women needing retraining as a result of the technological revolution.
- Increase research efforts to more accurately assess impact of federal student aid dollars on women. Make an optional request on student aid application forms for students to indicate sex and minority status - so as to improve research efforts.

IMPROVE CURRENT STUDENT AID NEEDS ANALYSIS SYSTEMS SO AS TO MORE ACCURATELY REFLECT COST OF ATTENDANCE FOR ALL GROUPS OF WOMEN

- Increase to at least 50% appropriation allocated to less than half-time students. At present only 10% of campus-based program allocations may be used for less than half-time students.
- Clarify federal policy in allowing child care expenses as cost of attendance. Student financial aid needs anaysis systems must include allowances for child care and part time student enrollment.

- Prohibit federal funds to be dispersed to postsecondary institutions which refuse to comply with Title IX requirements.

- Design current grant programs to compensate for females more likely to default on student loans.

- Allow federal incentives/funding for postsecondary institutions that provide child care facilities for their students. Part of instituional funding under the campus-based programs could be targeted for child care programs.

- Increase national service and loan forgiveness options so as to reduce default rates.

COORDINATE EFFORTS AMONG FEDERAL PROGRAMS AND WITH BUSINESS AND INDUSTRY TO IMPROVE WOMEN'S EDUCATION EQUITY THROUGH STUDENT FINANCIAL ASSISTANCE

- Create within the Office of Student Financial Assistance in the U.S. Department of Education a Woman's Program specifically designed for federal student aid program assistance. Such a program should include activities such as Talent Search, Educational Opportunity Centers, Upward Bound program, and Special services for Disadvantaged Students as is currently operated under the Title III Program.

- SSIG and CWS legislation should encourage matching contributions from business, industry and all aspects of the private sector. Adequate funding must be provided so as not to limit state and private sector matching matching.[4]

- Target grants, loans, tax relief to support education/training costs for occupations of national or regional priority.[5]

STATE GOVERNORS, LEGISLATORS AND STATE HIGHER EDUCATION EXECUTIVE OFFICERS

- High cost specialty programs, such as medicatl schools should expand loan and scholarships for women as an immediate impact program to reduce the financial barriers which are restrictive to diversity.[2]

- Establish statewide student assistance service centers.[3]

- Institute complete student aid information service to AFDC and other public welfare recipients. Link financial aid information with AFDC computer system. (i.e., Oregon and Pennsylvania).

UNIVERSITY PRESIDENTS, ADMINISTRATORS AND STUDENT FINANCIAL AID OFFICERS

REVIEW, IMPROVE AND MONITOR INSTITUTIONAL POLICIES WHICH PROMOTE AND PROVIDE ACCOUNTABILITY FOR EQUITY IN STUDENT AID

- Increase female representation on boards of trustees and in administrative positions.

COORDINATE AND LINK STUDENT AID INFORMATION, SERVICES AND EXPERTISE WITH BUSINESS, LABOR, SCHOOL SYSTEMS AND OTHER INSTITUTIONS.

- Expand inter-institutional collaboration to improve education equity for women.[1]
- Improve student aid information linkages with local school systems, and work extensively with local high schools.[2]
- Improve information dissemination efforts in student aid for all students.[6]

CORPORATE, BUSINESS AND LABOR LEADERS

- Send more women to school with company benefits.
- Career planning and information should be included in Title IV support programs

WOMEN

- Establish networks to provide information, support systems, and influence policy in student financial assistance.
- Become knowledgeable and more involved in actual decision making process in student aid.

IX. CONCLUSION

It is important to remember that a major intent behind the current re-examination of excellence in education is the hope that our nation will be recommitted to the belief that the improvement of education in our country will expand individual choice and tap unrealized promise and potential. Further, the dimension of equity is compatible with and reinforcing of the quality dimension in education.[1] The importance of equity in achieving educatioal excellence has been emphasized in all of the recent major national reports.

A strong federal committment to women's equity in student financial assistance is clearly in the national interest. Universities and the federal government are very interdependent and the health and vitality of one has been found to reflect and promote the health and productivity of the other.[2] Federal student aid programs and policies must adapt to enrollment trends and economic needs of women and it must be assured that student financial aid policy adequately facilitates the preparation of all students for a future in which math and science knowledge will be essential tools for success in the work place. Women must not be locked out of tomorrow's workforce because they lack a background in math and science. The educational purchasing power of federal student aid grants, loans and work study has become enmeshed in dangerous economic currents and thus, this diminished power has eroded our national objective of guaranteeing access and choice to a postsecondary education. The federal safety net for developing national human capital needs to be strengthened, particularly for women.

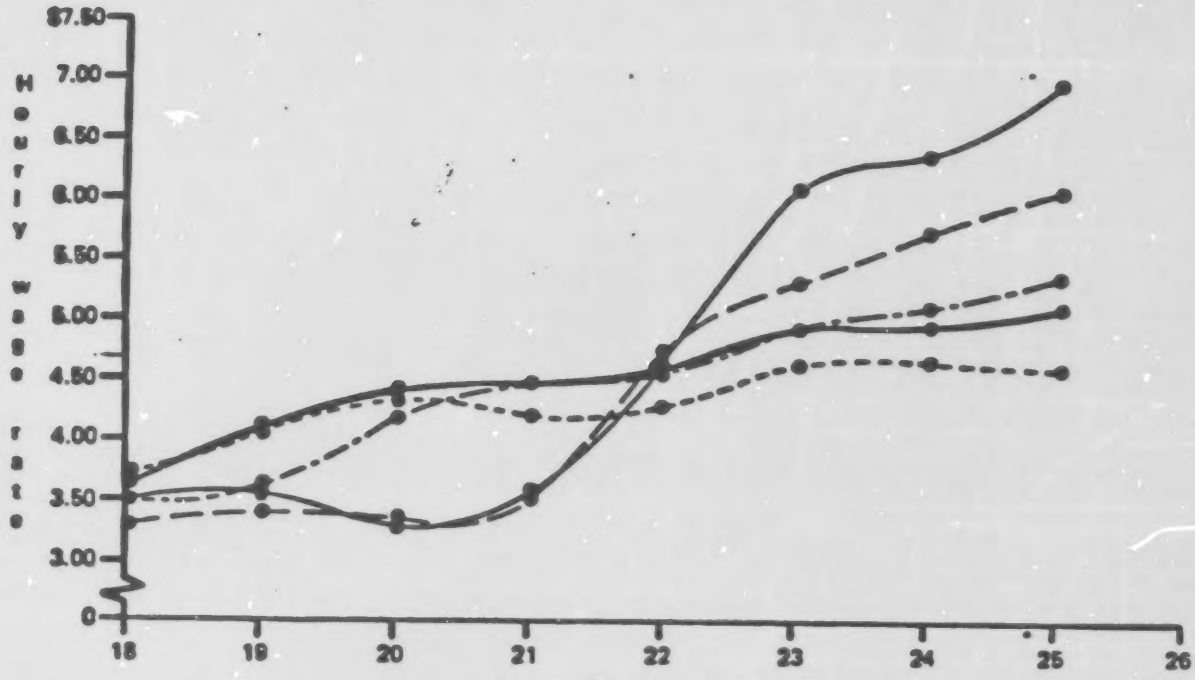
The passage of Title IX has marked the successful first step for improving equality in education for women by mandating the removal of legislative, regulatory and policy restrictions for women. Now it becomes imperative for the nation to enter into the second phase of education opportunity for women and that is to launch a concerted effort at removing financial barriers by improving student financial aid policies and practices. The Supreme Court Decision in Grove City vs Beil can be very effectively utilized as a federal wedge to improve student aid equity for women. The Office for Civil Rights must now emphasize equity in student financial assistance which has been virtually ignored since the passage of Title IX.

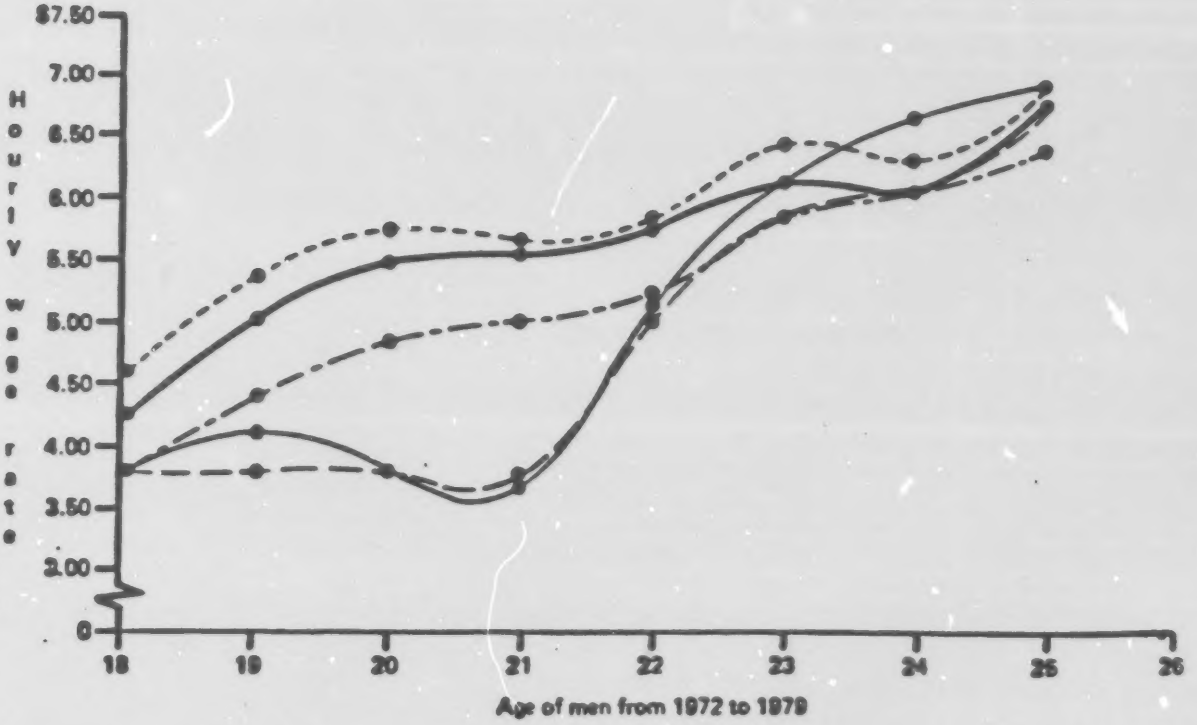
APPENDIX A

IMPACT OF POSTSECONDARY EDUCATION ON INDIVIDUAL INCOME AND POVERTY RATES

Table 1

Figure 1: Median wages, by a[illegible] for 1972 high school seniors with various 1979 educational attainments





No college
Less than 2 years college
2 years college or more
Bachelor degree
Advanced degree

Sources: Tables 1 and 2.

Source: Andrew Kolstad, "Does College Pay? Wage Rates Before and After Leaving School". Washington, D.C.: National Center for Education Statistics. November, 1982.

Table 4.3
Persons 22 Years Old and Over Below Poverty Level,[1] by Age Group, Educational Attainment, Sex, and Race: 1981

Years of School Completed, Sex, and Race	Total	22 to 34 Years Old	35 to 64 Years Old	65 Years Old and Over	Total	22 to 34 Years Old	35 to 64 Years Old	65 Years Old and Over
	Number Below Poverty Level, in Thousands				Poverty Rate			
Total	16,732	6,074	6,805	3,853	11.3	11.8	9.5	15.3
5 years or less	2,013	196	865	952	35.2	35.3	34.5	35.9
6 to 8 years	3,480	548	1,451	1,482	21.6	33.9	20.2	20.3
9 to 11 years	3,622	1,413	1,577	632	18.6	27.8	15.4	15.2
12 years	5,049	2,465	2,043	542	8.8	11.4	7.0	8.3
1 or more years of college	2,568	1,453	871	245	5.2	6.5	3.8	5.4
Male	6,001	2,361	2,559	1,080	8.6	9.3	7.4	10.5
5 years or less	839	83	392	364	29.1	29.1	29.3	28.9
6 to 8 years	1,144	213	561	370	15.5	27.4	15.4	12.4
9 to 11 years	1,140	471	500	169	13.1	19.6	10.7	10.4
12 years	1,736	915	709	112	7.1	9.0	5.9	4.8
1 or more years of college	1,140	679	398	65	4.3	5.8	3.1	3.1
Female	10,731	3,713	4,246	2,773	13.7	14.2	11.4	18.6
5 years or less	1,174	112	473	588	41.4	41.5	40.3	42.3
6 to 8 years	2,336	336	889	1,112	26.9	40.1	25.1	25.8
9 to 11 years	2,482	942	1,076	463	23.0	35.2	19.4	18.2
12 years	3,313	1,550	1,334	429	10.1	13.5	7.9	10.2
1 or more years of college	1,427	774	473	180	6.1	7.2	4.7	7.3
White	12,066	4,243	4,845	2,978	9.3	9.7	7.7	13.1
5 years or less	1,267	160	550	558	30.9	32.9	30.8	30.4
6 to 8 years	2,604	407	995	1,202	19.0	30.8	17.0	18.5
9 to 11 years	2,392	876	1,004	512	14.8	21.8	12.1	13.4
12 years	3,786	1,711	1,583	492	7.4	9.2	6.0	7.9
1 or more years of college	2,016	1,088	714	214	4.5	5.6	3.5	4.9
Black	4,154	1,591	1,743	820	27.3	26.3	24.7	39.0
5 years or less	655	16	271	368	49.3	(2)	46.6	51.9
6 to 8 years	797	116	410	271	38.3	47.5	35.4	39.6
9 to 11 years	1,142	498	539	105	37.6	51.7	30.7	32.5
12 years	1,116	655	413	48	21.6	24.5	18.3	21.0
1 or more years of college	441	306	108	27	12.3	14.3	8.3	17.3

Table 4.3

1/Income for 1981 as reported in March of the following year.
2/Base less than 75,000.

SOURCE: U.S. Department of Commerce, Bureau of the Census, Current Population Reports, Series P-60, No. 138, Consumer Income: Characteristics of the Population Below the Poverty Level: 1981.

APPENDIX B

DATA REQUIRED BY U.S. OFFICE FOR CIVIL RIGHTS FOR

ANALYSIS OF FINANCIAL ASSISTANCE

DATA REQUIRED FOR ANALYSIS OF FINANCIAL ASSISTANCE

I. Merit Based Financial Assistance

A. Comparison of Students Receiving Financial Assistance

- summary data of total enrollment by race, sex and national origin, broken down by students receiving and not receiving financial assistance by race, sex and national origin[1]

B. Comparison of Average Size and Type of Financial Assistance

- individual records or a list of all awards
- the race, sex, and/or national origin of each student receiving financial assistance
- the source of each award
- the type of assistantship or employment performed

C. Analysis of Criteria to Determine Which Students Receive Merit Based Financial Assistance

- the criteria, guidelines, or standards used to determine which students receive financial assistance
- the application of each student who applied or was considered for financial assistance (test scores, grades, recommendations)[2]
- any evaluation or rating used by the school, department, or program for determining which students receive financial assistance

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II. Need Based Financial Assistance

A. Comparison of Students Receiving Financial Assistance

- See A above

B. Comparison of Average Size and Type of Financial Assistance

- See B above

C. Replication of the Process by Which Need Is Determined

- Guidelines or standards used by the school for determining a student's need
- For each student in the sample, the completed Graduate and Professional School Financial Aid Service form (or form provided by other services)2/
- For each student in the sample, the actual award made by the school, including the components (e.g., scholarships, grant, loan) of each award and the source of each component2/

D. Comparison of the Elements by Which Need is Determined and Met

- For each student in the sample, the parents' contribution, the student's contribution, need, award and the extent of the student's "self-help" contribution2/

1/ If the institution does not maintain data on students receiving financial assistance by race, national origin, or sex, this is not a violation of Title VI or Title IX. Institutions may be requested to maintain such data, in accord with Departmental requirements, under 34 C.F.R. 100.6(c) and 34 C.F.R. 106.71.

2/ It is not necessary that any student be personally identified.

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RECOMMENDED STATISTICAL TEXTS-

Chi-Square
Herbert M. Blalock, Sr., Social Statistics (New York: McGraw-Hill, 1960, 1972, 1979), Chapter 15.

Fisher's Exact Test
Blalock, Social Statistics, Chapter 15.

Analysis of Variance
Blalock, Social Statistics, Chapter 16; John Neter and William Wasserman, Applied Linear Statistical Models (Homewood, Illinois: Richard D. Irvin, Inc., 1974) Part III.

Regression Analysis
Blalock, Social Statistics, Chapter 17, 18; Neter and Wasserman, Applied Linear Statistical Models, Part I.

Sampling Techniques
Blalock, Social Statistics, Chapter 21.

Source: U.S. Department of Education, Guidance for the Analysis of Student Financial Assistance in Determining Compliance With Title VI of the Civil Rights Act of 1964 and Title IX of the Education Amendments of 1972, Washington, D.C.: Office for Civil Rights, December 2, 1981.

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APPENDIX C

DISTRIBUTION OF TOTAL STUDENT AID BY GENDER

1. Student Aid Applicant Rates
2. High School and Beyond Survey
3. Distribution of Student Aid at Independent Institutions

Gender Difference in Total Average Grants, Loans and Earnings by Types of Institutions[1]

Sex	Type of Institution	Total Grant Amounts		Total Loan Amounts		Total Earnings	
		1980-81	1981-82	1980-81	1981-82	1980-81	1981-82
Male	Public 2-Yr	$1,142	$1,362	$ 754	$1,408	$ 711	$ 764
Female	Public 2-Yr	1,016	947	824	1,398	540	522
Male	Public 4-Yr	1,900	2,034	1,329	1,528	1,007	1,237
Female	Public 4-Yr	1,575	1,448	860	1,220	681	790
Male	Private 4-Yr	3,323	3,613	1,871	2,228	884	1,158
Female	Private 4-Yr	3,022	3,081	1,352	1,871	671	927
Male	Vocational[2]	1,303	1,481	2,137	1,901	812	534
Female	Vocational	1,260	1,025	1,362	1,976	848	481
Male	All	1,950	2,218	1,557	1,766	873	1,014
Female	All	1,688	1,609	1,152	1,492	650	694

Table 2

[1] The base for average dollar amounts is all low income (less than $12,000) 1980 high school seniors enrolled in post-secondary education in 1980-81 and 1981-82.

[2] Category includes all vocational and technical institutions as well as including proprietary institutions.

Source: U.S. Department of Education, Tabulations prepared by Longitudinal Studies Branch, National Center for Educational Statistics, The High School and Beyond Data, 83-9-8.

Distribution of Student Aid By Gender at Independent Institutions: 1981-1982[1]

Adjusted Gross Income Level	Tuition	Total Student Expenses	Expected Parental Contributions	Total Need-Based Grants[2]	Total Student Employment	Total Student Loans	Total Student Resources[3]	(Total Resource Total Expenses) Balance
Under $6,000								
Male (Sample N = $58,697)								
Average Dollar Amount	$4,089	$7,169	$217	$2,637	$665	$1,195	$6,723	-$446.00
% of Total Expenses	57.0%	100%	3.0%	36.8%	9.3%	16.7%	93.8%	-6.2%
Female (Sample N = 47,427)								
Average Dollar Amount	$3,682	$6,447	$102	$2,821	$386	$ 927	$5,648	-$799.00
% of Total Expenses	56.3%	100%	1.6%	43.8%	6.0%	14.4%	87.6%	-12.4%
$18,000 to $24,000								
Male (Sample N = 58,697)							$6,815 ~~$6,233~~	
Average Dollar Amount	$4,134	$7,173	$886	$2,348	$564	$1,449		-$358.00
% of Total Expenses	57.6%	100%	12.4%	32.7%	7.9%	20.2%	95.0%	-5.0%
Female (Sample N = 62,241)							$6,277 ~~$6,014~~	
Average Dollar Amount	$4,100	$7,031	$908	$2,186	$595	$1,283		-$754.00
% of Total Expenses	58.3%	100%	12.9%	31.1%	8.5%	18.3%	89.3%	-10.7%
$36,000 or more								
Male (Sample N = 59,819)								
Average Dollar Amount	$4,726	$8,042	$4,371	$1,146	$468	$1,927	$9,625	$1,582.00
% of Total Expenses	58.8%	100%	54.4%	14.2%	5.8%	24.0%	199.7%	19.7%
Female (Sample N = 65,107)								
Average Dollar Amount	$4,653	$7,956	$4,307	$1,144	$418	$1,808	$9,085	$1,129.00
% of Total Expenses	58.5%	100%	54.1%	14.4%	5.3%	22.7%	114.2%	14.2%

1 Sample is based on undergraduate dependent students only.
2 Need-based grants include Pell Grants, Supplemental Educational Opportunity Grants, State Grants and institutional grants.
3 Total student resources include expected student contributions and other aid in addition to expected parental contribution, total grants, total employment and total loans.

Source: Tabulations prepared by the National Institute of Independent Colleges and Universities, Washington, D.C., December 10, 1983.

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Table 12

Percentage By Sex of Student Aid Applicants with Need According to Class Level*

	1974-1975			1975-1976			1976-1977			1977-1978			1978-1979			1979-1980		
	M	F	T	M	F	T	M	F	T	M	F	T	M	F	T	M	F	T
Dependent	(N = 19,474)			(N = 27,892)			(N = 30,333)			(N = 23,580)			(N = 33,140)			(N = 35,424)		
Freshman	45	55	47	47	53	49	45	55	38	45	55	35	45	55	44	46	54	42
Sophomore	44	56	23	43	57	21	43	57	22	42	58	22	44	56	24	44	56	23
Junior	44	56	16	45	55	15	45	55	14	43	57	15	44	56	16	44	56	16
Senior	47	53	9	43	57	9	46	54	9	43	57	10	44	56	12	47	53	11
Graduate Student	58	42	3	59	41	3	53	47	2	57	43	3	55	45	2	58	42	1
Other or Unknown	44	56	2	43	57	2	49	51	15	49	51	15	47	53	1	47	53	7
Dependent Totals	45	55	100	46	54	2	46	54	100	45	55	100	45	55	100	46	54	100
Self-Supporting	(N = 5,533)			(N = 7,419)			(N = 9,343)			(N = 7,803)			(N = 10,133)			(N = 11,214)		
Freshman	38	62	24	39	61	26	38	62	23	36	64	19	32	68	22	34	66	22
Sophomore	44	56	22	39	61	22	44	56	22	40	60	21	38	62	21	37	63	20
Junior	49	51	21	48	52	19	49	51	18	48	52	19	45	55	22	43	57	21
Senior	52	48	15	54	46	14	53	47	15	53	47	17	50	50	20	49	51	21
Graduate Student	62	38	15	60	40	14	56	44	12	56	44	16	55	45	12	55	45	11
Other or Unknown	40	60	4	35	65	4	41	59	9	39	61	7	40	60	3	35	65	6
Self-Supporting Totals	47	53	100	46	54	100	46	54	100	45	55	100	43	57	100	42	58	100
All Applicants	(N = 25,007)			(N = 35,311)			(N = 39,676)			(N = 31,383)			(N = 43,273)			(N = 46,638)		
Freshman	44	56	42	46	54	45	44	56	34	44	56	31	43	57	39	45	55	37
Sophomore	44	56	23	42	58	21	43	57	22	42	58	22	43	57	23	42	58	22
Junior	45	55	17	46	54	16	46	54	15	44	56	16	44	56	18	44	56	17
Senior	49	51	11	47	53	10	48	52	10	46	54	12	46	54	14	48	52	13
Graduate Student	61	39	5	59	41	5	55	45	5	56	44	6	55	44	4	56	44	4
Other or Unknown	42	58	2	40	60	3	48	52	14	47	53	13	41	56	2	45	55	7
All Applicants Totals	45	55	100	46	54	100	46	54	100	45	55	100	44	56	100	45	55	100

* Based on all applicants with need.

Source: Mark Heffron, National Norms for ACT Financial Aid Applicants, ACT Student Need Analysis Service. Iowa City, Iowa: American College Testing.

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APPENDIX D

SIGNIFICANT TRENDS OF ENTERING FRESHMEN BY GENDER, 1966 - 1981

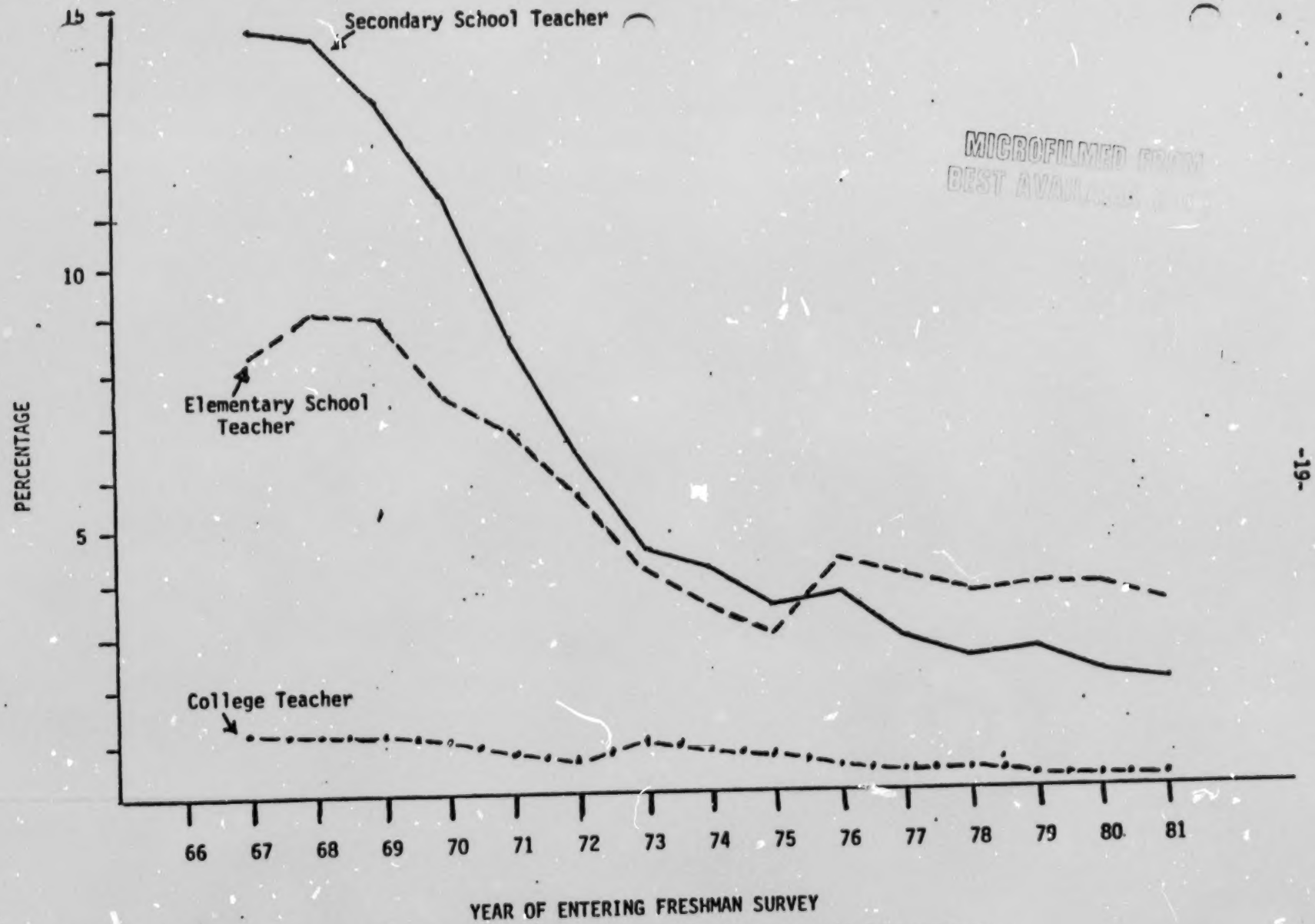

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Figure 6: Trends in the percent of freshmen aspiring to teaching careers.

Source: Alexander Astin, The American Freshman, 1966-1981: Some Implications for Educational Policy and Practice. University of California, Los Angeles and Higher Education Research Institute, Inc. Prepared for the National Commission on Excellence in Education. March 1983.

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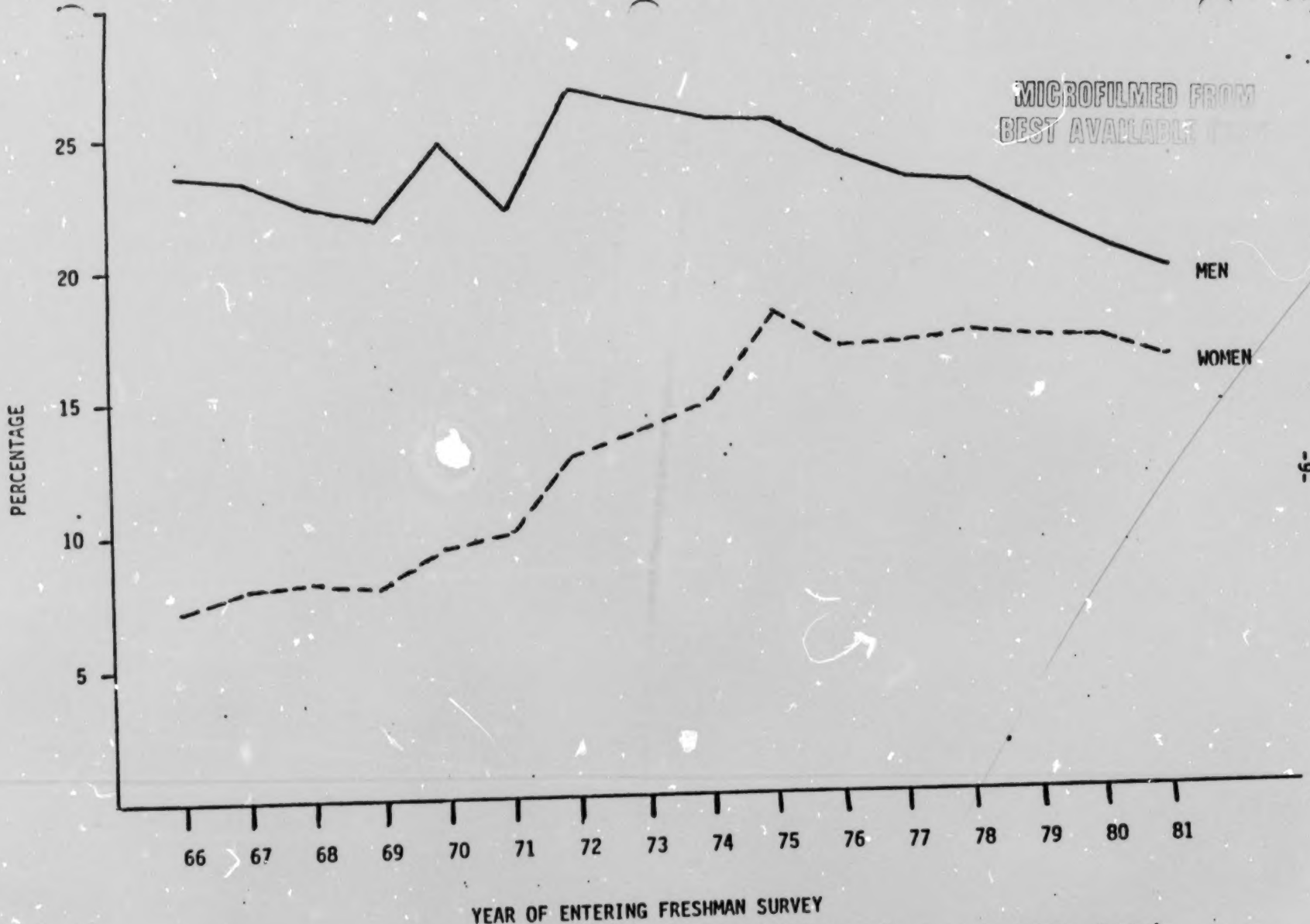

Figure 2: Trends, by sex, in percentage of freshmen aspiring for doctoral (Ph.D., Ed.D.) and high level professional degrees (LL.B., J.D., M.D., D.D.S.).

Source: Alexander Astin, The American Freshman, 1966-1981: Some Indications for Educational Policy and Practice. University of California, Los Angeles and Higher Education Research Institute, Inc. Report for The National Commission on Excellence

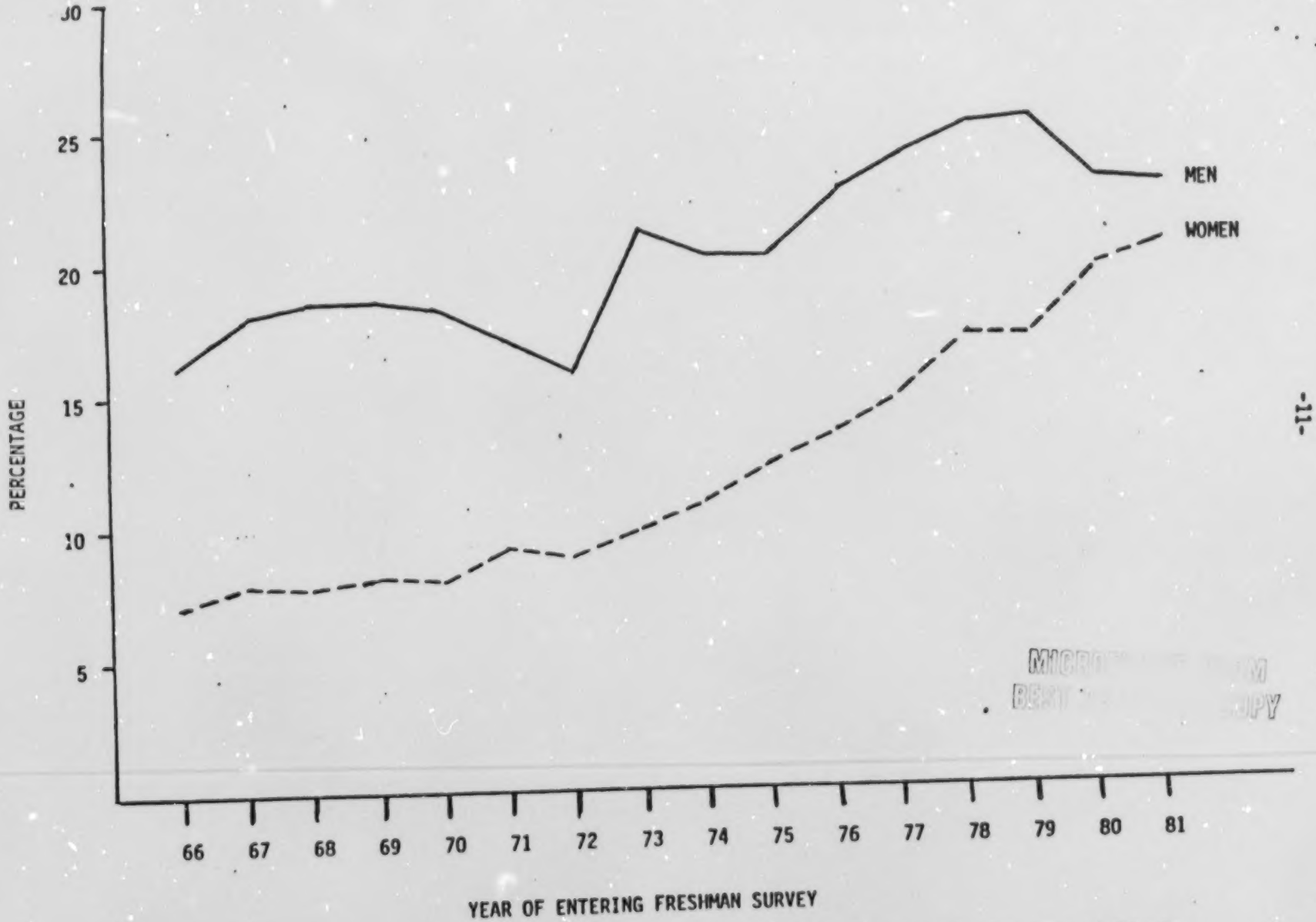

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Figure 3: Trends, by sex, in the percentage of freshmen planning to major in some field of business.

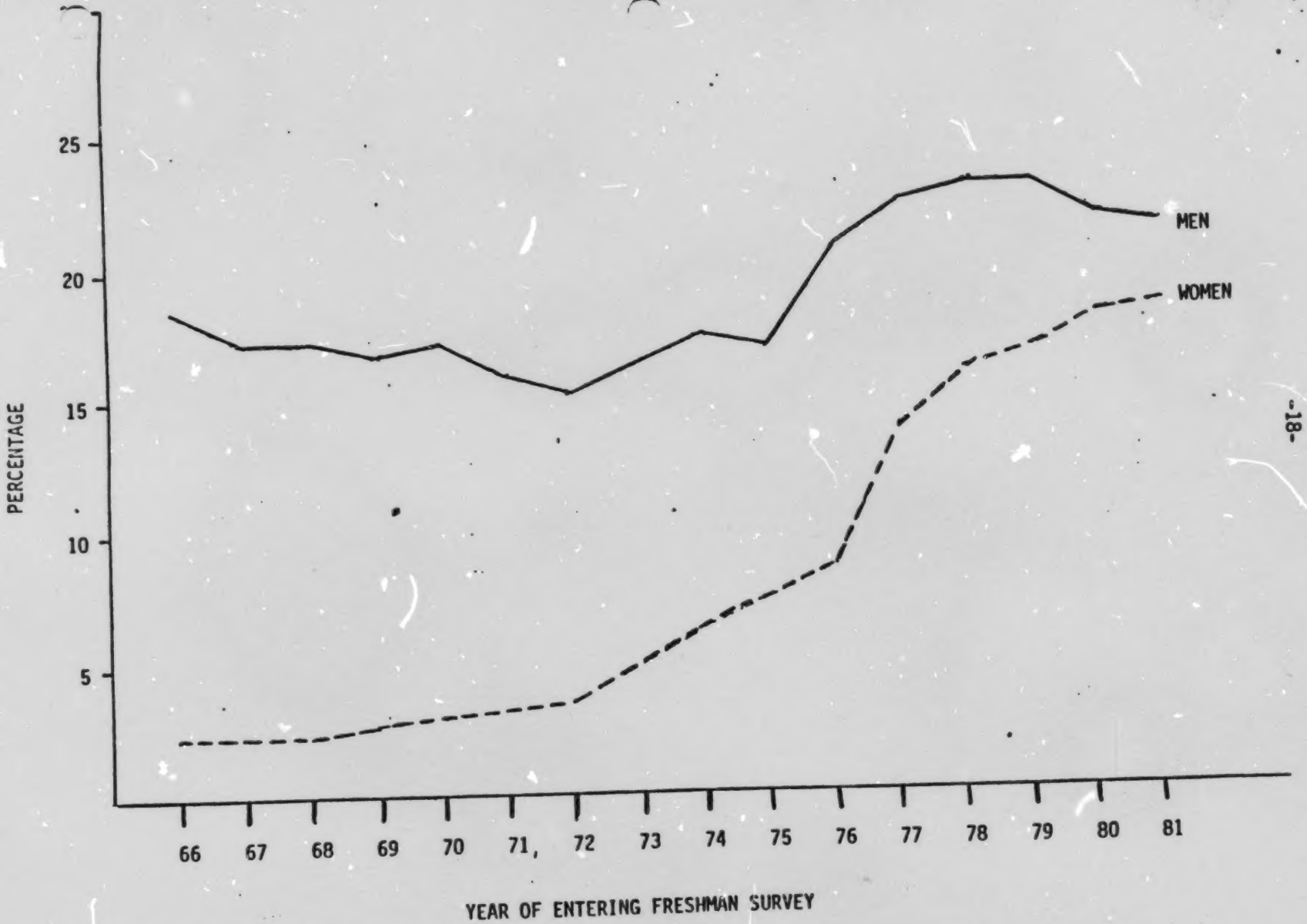

Figure 5: Trends, by sex, in the percent of freshmen aspiring to careers in business.

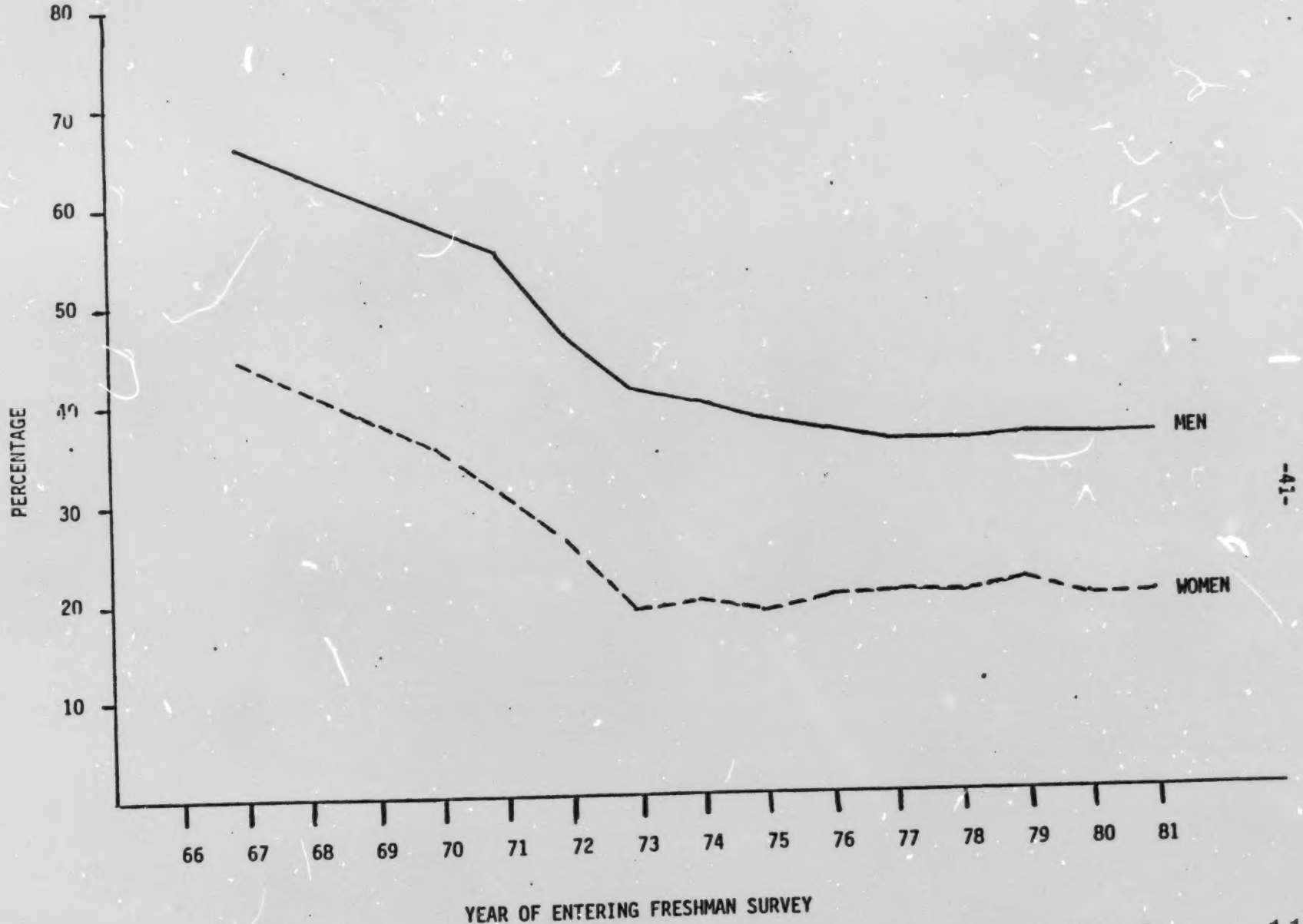

Figure 8: Trends, by sex, in thepercentage of freshmen agreeing that "the activities of married women are best confined to the home and family."

APPENDIX E

ENROLLMENT IN INSTITUTIONS OF HIGHER EDUCATION BY TYPE OF INSTITUTION AND GENDER: FALL 1979 - 1982

Enrollment in Institutions of Higher Education, By Control and Type of Institution and Sex of Student: 50 States and D.C., Fall 1979-82

Control and Type of Institution and Sex of Student	Fall 1979	Fall 1980	Fall 1981	Fall 1982	Percentage Change 1979-80	1980-81	1981-82
Total, All Institutions	11,569,899	12,096,895	12,371,672	12,425,780	+4.6	+2.3	+0.4
Public, Total	9,036,822	9,457,394	9,647,032	9,696,087	+4.7	+2.0	+0.5
Men	4,368,979	4,522,587	4,586,800	4,632,888	+3.5	+1.4	+1.0
Women	4,667,843	4,934,807	5,060,232	5,063,199	+5.7	+2.5	+0.1
Doctoral-Level	2,304,514	2,363,946	2,367,447	2,366,260	+2.6	+0.1	-0.1
Men	1,222,815	1,243,418	1,239,295	1,243,031	+1.7	-0.3	+0.3
Women	1,081,699	1,120,528	1,128,152	1,123,229	+3.6	+0.7	-0.4
Comprehensive	2,147,468	2,207,559	2,227,725	2,224,856	+2.8	+0.9	-0.1
Men	1,011,261	1,038,644	1,038,156	1,046,402	+1.9	+0.7	+0.8
Women	1,136,207	1,176,915	1,189,569	1,178,454	+3.6	+1.1	-0.9
General Baccalaureate	375,396	395,330	401,857	410,084	+5.3	+1.7	+2.0
Men	180,256	186,426	189,478	194,974	+3.4	+1.6	+2.9
Women	195,140	208,904	212,379	215,110	+7.1	+1.7	+1.3
Specialized	143,817	180,029	185,948	193,443	+25.2	+3.3	+4.0
Men	92,287	122,951	126,647	131,747	+33.2	+3.0	+4.0
Women	51,530	57,078	59,301	61,696	+10.8	+3.9	+4.0
2-Year	4,065,627	4,283,678	4,432,157	4,463,945	+5.4	+3.5	+0.7
Men	1,862,360	1,926,270	1,977,758	1,998,341	+3.4	+2.7	+1.0
Women	2,203,267	2,357,408	2,454,399	2,465,604	+7.0	+4.1	+0.5
New	0	26,852	31,898	37,499	+0.0	+18.8	+17.6
Men	0	12,878	15,466	18,393	+0.0	+20.1	+18.9
Women	0	13,974	16,432	19,106	+0.0	+17.6	+16.3

Source: U.S. Department of Education, Washington, D.C. National Center for Education Statistics, 1983.

Enrollment in Institutions of Higher Education, By Control and Type of Institution and Sex of Student: 50 States and D.C., Fall 1979-82

Control and Type of Institution and Sex of Student	Fall 1979	Fall 1980	Fall 1981	Fall 1982	Percentage Change 1979-80	Percentage Change 1980-81	Percentage Change 1981-82
Private, Total	2,533,077	2,639,501	2,724,640	2,729,693	+4.2	+3.2	+0.2
Men	1,313,898	1,351,787	1,388,256	1,398,496	+2.9	+2.7	+0.7
Women	1,219,179	1,287,714	1,336,384	1,331,197	+5.6	+3.8	-0.4
Doctoral-Level	658,242	664,922	678,916	661,916	+1.0	+2.1	-2.5
Men	374,726	376,568	379,718	369,515	+0.5	+0.8	-2.7
Women	283,516	288,354	299,198	292,401	+1.7	+3.8	-2.3
Comprehensive	599,136	606,176	611,799	612,889	+1.2	+0.9	+0.2
Men	315,103	313,303	312,309	312,388	-0.6	-0.3	+0.0
Women	284,033	292,873	299,490	300,501	+3.1	+2.3	+0.3
General Baccalaureate	746,353	777,337	784,065	770,931	+4.2	+0.9	-1.7
Men	338,278	345,001	347,100	340,989	+2.0	+0.6	-1.8
Women	408,075	432,336	436,965	429,942	+5.9	+1.1	-1.6
Specialized	348,347	363,248	373,510	382,000	+4.3	+2.8	+2.3
Men	212,408	216,355	219,353	221,853	+1.9	+1.4	+1.1
Women	135,939	146,893	154,157	160,147	+8.1	+4.9	+3.9
2-Year	180,605	188,407	197,951	201,994	+4.3	+5.1	+2.0
Men	73,089	73,531	77,062	80,016	+0.6	+4.8	+3.8
Women	107,516	114,876	120,889	121,978	+6.8	+5.2	+0.9
New	394	39,411	78,399	99,963	+9902.8	+98.9	+27.5
Men	294	27,029	52,714	73,735	+9093.5	+95.0	+39.9
Women	100	12,382	25,685	26,228	+12282.0	+107.4	+2.1

Source: U.S. Department of Education, Washington, D.C. National Center for Education Statistics, 1983.

Enrollment in Institutions of Higher Education, By Control and Type of Institution and Sex of Student: 50 States and D.C., Fall 1979-82

Control and Type of Institution and Sex of Student	Fall 1979	Fall 1980	Fall 1981	Fall 1982	Percentage Change 1979-80	Percentage Change 1980-81	Percentage Change 1981-82
Private, Nonprofit	2,461,773	2,527,787	2,572,405	2,552,739	+2.7	+1.8	-0.8
Men	1,281,688	1,295,652	1,305,426	1,292,027	+1.1	+0.8	-1.0
Women	1,180,085	1,232,135	1,266,979	1,260,712	+4.4	+2.8	-0.5
Doctoral-Level	658,242	664,922	678,916	661,916	+1.0	+2.1	-2.5
Men	374,726	376,568	379,718	369,515	+0.5	+0.8	-2.7
Women	283,516	288,354	299,198	292,401	+1.7	+3.8	-2.3
Comprehensive	599,136	606,176	611,799	612,689	+1.2	+0.9	+0.2
Men	315,103	313,303	312,309	312,388	-0.6	-0.3	+0.0
Women	284,033	292,873	299,490	300,501	+3.1	+2.3	+0.3
General Baccalaureate	741,295	772,214	778,910	766,108	+4.2	+0.9	-1.6
Men	335,942	342,706	344,781	338,840	+2.0	+0.6	-1.7
Women	405,353	429,508	434,129	427,268	+6.0	+1.1	-1.6
Specialized	334,802	344,958	352,404	359,334	+3.0	+2.2	+2.0
Men	201,858	203,053	203,812	204,554	+0.6	+0.4	+0.4
Women	132,944	141,905	148,592	154,780	+6.7	+4.7	+4.2
2-Year	127,904	131,429	135,256	130,252	+2.8	+2.9	-3.7
Men	53,765	54,277	55,051	53,161	+1.0	+1.4	-3.9
Women	74,139	77,152	80,205	77,091	+4.1	+4.0	-3.9
New	394	8,088	15,120	22,240	+1952.8	+86.9	+47.1
Men	294	5,745	9,755	13,569	+1854.1	+69.8	+39.1
Women	100	2,343	5,365	8,671	+2243.0	+129.0	+61.6

Source: U.S. Department of Education, Washington, D.C. National Center for Education Statistics, 1983.

Enrollment in Institutions of Higher Education, By Control and Type of Institution and Sex of Student: 50 States and D.C., Fall 1979-82

Control and Type of Institution and Sex of Student	Fall 1979	Fall 1980	Fall 1981	Fall 1982	Percentage Change 1979-80	Percentage Change 1980-81	Percentage Change 1981-82
Private, Proprietary	71,304	111,714	152,235	176,954	+56.7	+36.3	+16.2
Men	32,210	56,135	82,830	106,469	+74.3	+47.6	+28.5
Women	39,094	55,579	69,405	70,485	+42.2	+24.9	+1.6
Doctoral-Level	0	0	0	0	+0.0	+0.0	+0.0
Men	0	0	0	0	+0.0	+0.0	+0.0
Women	0	0	0	0	+0.0	+0.0	+0.0
Comprehensive	0	0	0	0	+0.0	+0.0	+0.0
Men	0	0	0	0	+0.0	+0.0	+0.0
Women	0	0	0	0	+0.0	+0.0	+0.0
General Baccalaureate	5,058	5,123	5,155	4,823	+1.3	+0.6	-6.4
Men	2,336	2,295	2,319	2,149	-1.8	+1.0	-7.3
Women	2,722	2,828	2,836	2,674	+3.9	+0.3	-5.7
Specialized	13,545	18,290	21,106	22,666	+35.0	+15.4	+7.4
Men	10,550	13,302	15,541	17,299	+26.1	+16.8	+11.3
Women	2,995	4,988	5,565	5,367	+66.5	+11.6	-3.6
2-Year	52,701	56,978	62,695	71,742	+8.1	+10.0	+14.4
Men	19,324	19,254	22,011	26,855	-0.4	+14.3	+22.0
Women	33,377	37,724	40,684	44,887	+13.0	+7.8	+10.3
New	0	31,323	63,279	77,723	+0.0	+102.0	+22.8
Men	0	21,284	42,959	60,166	+0.0	+101.8	+40.1
Women	0	10,039	20,320	17,557	+0.0	+102.4	-13.6

Source: U.S. Department of Education, Washington, D.C. National Center for Education Statistics, 1983.

Table 3

Composition of the Enrollment Increase

1970 to 1980

By Sex, Enrollment Status, and ~~Type~~ of Institution

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	Percent of Increase		Number Increase
Women/Full Time/Four Year	23.6%		652,000
Women/Part Time/Two Year	17.1		474,000
Women/Full Time/Two Year	11.1		307,000
Women/Part Time/Four Year	10.7		298,000
		62.5%	
Women/Full Time/Graduate	7.6		209,000
Women/Part Time/Graduate	7.3		202,000
		14.9%	
Women		77.4%	
Men/Part Time/Two Year	6.5%		181,000
Men/Part Time/Four Year	5.7		157,000
Men/Full Time/Four Year	4.8		134,000
Men/Part Time/Graduate	2.6		72,000
Men/Full Time/Graduate	2.5		68,000
Men/Full Time/Two Year	0.5		13,000
Men		22.6%	
Total		100.0%	

Source: U.S. Department of Commerce, Bureau of the Census, Current Population Reports, Population Characteristics, Series P-20, Number 362, Government Printing Office, Washington, D.C. (May 1981), p. 7.

statistical highlight
National Center for Education Statistics

Trends in College Enrollment: 1972 to 1982

Each fall the National Center for Education Statistics (NCES) conducts a survey of enrollment in colleges, universities, and professional schools throughout the country. In October each year the Bureau of the Census, in its Current Population Survey, obtains data on the demographic characteristics of college students. Data from the fall 1982 surveys have recently become available. When the statistics for fall 1982 are compared with those for a decade earlier, some interesting trends in college enrollment emerge.

According to the NCES surveys, college enrollment increased from 9.2 million in fall 1972 to 12.4 million in fall 1982. The Bureau of the Census figures are quite similar. Both agencies reported a total enrollment increase of about 35 percent over the past decade. As the accompanying chart indicates, however, there were major differences in the rate of increase in college attendance among the various groups represented in the surveys. Growth rates were quite high for black and other races, persons 25 years old and over, students in 2-year institutions, part-time students, and women. They were relatively low for men, full-time students, persons 18 to 24 years old, students in universities and other 4-year institutions, and white students. The rate of growth was slightly above average for students in publicly controlled institutions and somewhat below average for those in private colleges and universities.

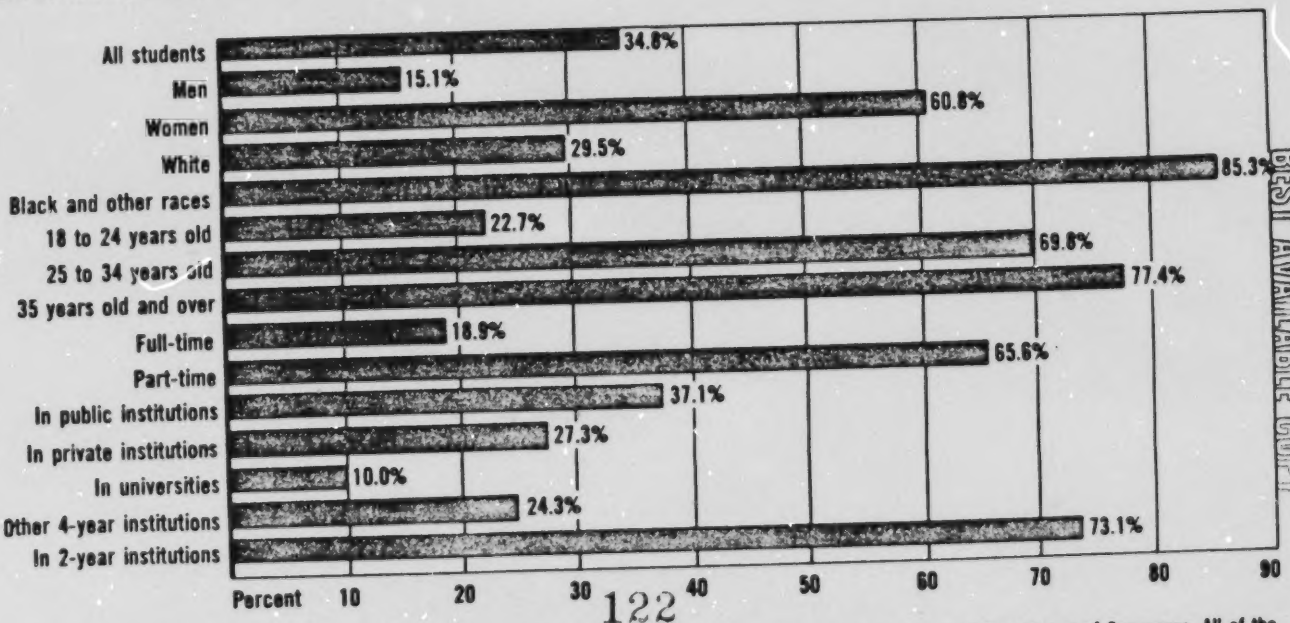
The proportion of college students who were women rose from 43.1 percent in 1972 to 51.5 percent in 1982. Black and other races represented 10.4 percent of total enrollment in 1972 compared with 14.3 percent 10 years later. Students 25 years of age and over accounted for 28.0 percent of the enrollment in 1972 and for 35.6 percent of the total in 1982. Part-time students constituted 34.1 percent of the entire student body in 1972 compared with 41.9 percent last fall.

Two-year colleges increased their share of total enrollment from 29.9 percent in 1972 to 38.4 percent in 1982. Publicly controlled institutions enrolled 76.7 percent of the students a decade earlier compared with 78.0 percent of 1982.

More detailed information on college enrollment may be found in the NCES reports on *Fall Enrollment in Colleges and Universities* and in the Bureau of the Census reports on *School Enrollment—Social and Economic Characteristics of Students*.

—W. Vance Grant
Specialist in Education Statistics

Percentage increases in the enrollment of college students with selected characteristics: United States, fall 1972 to fall 1982



SOURCES: Data by race and by age are derived from the current population surveys of the Bureau of the Census, U.S. Department of Commerce. All of the other statistics are from the fall enrollment surveys of the National Center for Education Statistics, U.S. Department of Education.

NCES 84-403

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APPENDIX F

STUDENT EXPENSES AND SOURCES OF SUPPORT FOR DEPENDENT AND INDEPENDENT STUDENTS, 1981 - 1982

Table 9

Student Expenses and Sources of Support:
Dependent Recipients of Need-based Aid, 1981-1982

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	Independent Institutions		Public Institutions		Proprietary Institution.	
	Average Dollars	Percent of Total Costs	Average Dollars	Percent of Total Costs	Average Dollars	Percent of Total Costs
STUDENT EXPENSES:						
Tuition, fees	$4,190		$ 921		$2,815	
Other	3,039		2,844		2,733	
Total, expenses	$7,229	100%	$3,833	100%	$5,548	100%
STUDENT RESOURCES:						
PARENTAL CONTRIBUTION	$1,305	18%	$ 469	12%	$ 481	9%
GRANTS (NEED-BASED)						
Pell	$ 529	7%	$ 714	19%	$ 970	18%
SEOG	222	3	117	3	128	2
State (incl. SSIG)	611	9	159	4	128	2
Institutional	822	11	43	1	2	0
Total, Grants	$2,185	30%	$1,033	27%	$1,228	22%
STUDENT EMPLOYMENT						
Coll. Work-Study	$ 428	6%	$ 252	7%	$ 66	1%
State/institut.	124	2	94	2	39	1
Total, Employment	$ 551	8%	$ 346	9%	$ 104	2%
LOANS						
NDSL	$ 339	5%	$ 156	4%	$ 225	4%
GSL/FISL	1,110	15%	555	15	1,235	22
Institutional	21	0	8	0	8	0
Total, Loans	$1,470	20%	$ 719	19%	$1,468	26%
STUDENT CONTRIBUTION	$ 891	12%	$ 540	14%	$ 423	8%
OTHER AID	$ 569	8%	$ 282	7%	$ 193	4%
TOTAL, ALL RESOURCES:	$6,972	97%	$3,390	88%	$3,897	70%
BALANCE: REMAINING NEED	$ 257	3%	$ 443	12%	$1,651	30%

NOTE: Each dollar figure is an average; individual averages do not precisely add to subtotal and total averages.

Source: Elaine El-Khawas, Comparison Data From Public, Independent and Proprietary Institutions. Tables compiled for policy seminar sponsored by The American Council on Education and The National Commission for Student

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Table 10

Student Expenses and Sources of Support:

Independent Recipients of Need-based Aid, 1981-1982

	Independent Institutions		Public Institutions		Proprietary Institutions	
	Average Dollars	Percent of Total Costs	Average Dollars	Percent of Total Costs	Average Dollars	Percent of Total Costs
STUDENT EXPENSES:						
Tuition, fees	$3,326		$ 702		$2,831	
Other	4,998		$5,370		$4,578	
Total, expenses	$8,224	100%	$6,125	100%	$7,410	100%
STUDENT RESOURCES:						
PARENTAL CONTRIBUTION	$ 136	2%	$ 11	0%	$ 0	0%
GRANTS (NEED-BASED)						
Pell	$1,169	14%	$ 832	14	$1,101	15%
SEOG	76	1	146	2	126	2
State (incl. SSIG)	1,013	12	158	2	54	1
Institutional	374	5	31	1	0	0
Total, Grants	$2,633	32%	$1,168	19%	$1,281	17%
STUDENT EMPLOYMENT						
Coll. Work-Study	$ 231	3%	276	4%	$ 35	1%
State/institut.	95	1	171	3	74	1
Total, Employment	$ 325	4%	$ 447	7%	$ 109	2%
LOANS						
NDSL	$ 143	2%	$ 161	3%	$ 263	4
GSL/FISL	734	9	534	9	1,221	16
Institutional	44	0	17	0	13	0
Total, Loans	$ 921	11%	$ 712	12%	$1,497	20%
STUDENT CONTRIBUTION	$2,096	26%	$1,959	32%	$2,070	28%
OTHER AID	$ 667	8%	$ 339	6%	$ 292	4%
TOTAL, ALL RESOURCES:	$6,777	82%	$4,636	76%	$5,249	71%
BALANCE: REMAINING NEED	$1,447	18%	$1,488	24%	$2,160	29%

Source: Elaine El-Khawas, Comparison Data From Public, Independent and Proprietary Institutions. Tables compiled for policy seminar sponsored by The American Council on Education and The National Commission on Student Financial Assistance.

APPENDIX G

REGULATORY REVIEW OF FEDERAL STUDENT AID PROGRAMS

1. Pell Grant
2. College Work Study
3. Guaranteed Student Loan
4. National Direct Student Loan
5. State Student Incentive Grant

Table 14

REGULATORY REVIEW OF THE PELL GRANT PROGRAM

REGULATORY POLICIES RESTRICTING FEMALE PARTICIPATION IN POSTSECONDARY EDUCATION

- Eligibility is restricted to at least half time undergraduate students.
  (20 U.S.C. 1070a) (34 CFR 690.4)

- Child care expenses are not explicitly included as an allowable cost of attendance, nor is an adequate amount authorized for miscellaneous expenses. Besides tuition and fees and room and board, allowable costs of attendance includes an allowance of $400 for books, supplies, and miscellaneous expenses for an academic year.
  (Supplemental Appropriations and Rescission Act, 1981, P.L. 97-12)
  (34 CFR 690.51)

- No assurance is required under audit and examination requirements that Pell Grants are not used as a substitute for other grants women may have received or that Pell Grants are not utilized to justify increases in tuition or student costs.
  (20 U.S.C. 1070a) (34 CFR 690.85)

- No requirement on the part of the institution to account for average awards or participation rates on the part of women or minorities
  (20 U.S.C. 1070a) (34 CFR 690.85)

- Funding reduction policies for Pell Grants have resulted in a reduction of participation rates among both males and females, but moreso for low income females. The Higher Education Act of 1965, as amended specifies that the maximum award will be $2,500 and that awards can cover up to 65 percent of the cost of attendance.
  (20 USC 1070a)

REGULATORY POLICIES FACILITATING FEMALE PARTICIPATION IN POSTSECONDARY EDUCATION

- An institution may pay a Pell Grant to a student who is in default on a Guaranteed Student Loan or a PLUS Loan if the Secretary (for federally insured loans) or a guarantee agency (for a loan insured by that guarantee agency) determines that the student has made satisfactory arrangements to repay the defaulted loan.
  (20 U.S.C. 1070a) (34 CFR 690.75(g))

- An institution may pay a Pell Grant to a student who is in default on a National Defense/Direct Student Loan made at that institution, if the student has made arrangements, satisfactory to the institution, to repay the loan.
  (20 U.S.C. 1070a) (34 CFR 690.75(g))

- The Secretary does not consider a loan made under the National Defense Student Loan, National Direct Student Loan, Guaranteed Student Loan, or Parent Loans for Undergraduate Students Program which is discharged in bankruptcy to be in default for purposes of paying Pell Grants.
  (20 U.S.C. 1070a) (34 CFR 690.75(g))

- If an institution believes, but cannot document, that inaccuracies exist on the SER (Student Eligibility Report), it may not withold payments unless authorized by the Secretary. These cases must be forwarded to the Secretary.
  (20 U.S.C. 1070a) (34 CFR 690.77)**

**Regulatory provision has potential for women, but current impact cannot be determined and/or is questionable.

Table 18

REGULATORY REVIEW OF THE COLLEGE WORK STUDY PROGRAM

POLICIES RESTRICTING FEMALE PARTICIPATION IN POSTSECONDARY EDUCATION

- No explicit requirement relating to equal pay for equal work under the establishment of wage rates. Also, an institution may pay a graduate student it employs a salary or on an hourly wage bases, "in accordance with its usual practices".
  (42 U.S.C. 2753) (46 CFR 675.24).

- Eligibility is restricted to regular students who are enrolled on at least a half-time basis (46 CFR 675.6). An institution may use not more than 10 percent of its allocation to pay the compensation of eligible students who are enrolled as less than half-time students
  (20 U.S.C. 1070b-2 and 1091f) (46 CFR 675.9)

- Fellowships and assistantships count as financial aid "unless it is the institution's stated practice to consider the holders faculty members". These positions are usually instructor or lecturer positions at lower pay plus do not count as years of service for tenure.
  (20 U.S.C. 1094) (46 CFR 675.20)

- When determining the federal share for CWS institutions may not include "fringe benefits such as paid sick days, paid vacations, or paid holidays". Since these are not allowable, women will most likely not receive any.
  (42 U.S.C. 2753 and 20 U.S.C. 1055) (46 CFR 675.26)

- A job location and development project "may not locate or develop jobs for students upon graduation".
  (42 U.S.C. 2756a) (46 CFR 675.37)

- The institution may not provide CWS employment to a student if it "believes" the student does not intend to enroll in a subsequent term after attending a special session.
  (42 U.S.C. 2753) (46 CFR 675.10)

- Fiscal-Operations Reports submitted annually by institutions to the U.S. Department of Education do not provide information on distribution of funds by sex or minority categories.
  (42 U.S.C. 2753; 20 U.S.C. 1232c) (46 CFR 675.19)

POLICIES FACILITATING FEMALE PARTICIPATION IN POSTSECONDARY EDUCATION

- Job Location and Development Program. This program is intended to expand off-campus job opportunities for students enrolled in eligible institutions of higher education who want jobs, regardless of their financial need.
  (42 U.S.C. 2756a) (46 CFR 675.31)**

REGULATORY REVIEW OF THE COLLEGE WORK STUDY PROGRAM

(continued)

- Community Service Learning Program. The purpose of this program is to expand off-campus job opportunities for students enrolled in eligible institutions of higher education who wan jobs, regardless of their financial need.
  (42 U.S.C. 2756b) (46 CFR 675.28)**

- Determination of Cost of Attendance does allow for a student with dependent children, an allowance based on the expenses "reasonably incurred" for child care
  (20 U.S.C. 1089(d)) (46 CFR 675.11)**

- Allowable administrative costs for the Community Service Learning Program may include the costs of developing mechanisms to assure the academic quality of the student experience and assuring student access to educational resources, expertise, and supervision necessary to achieve community service objectives
  (20 U.S.C. 1096; 42 U.S.C. 2753, 2756 and 2756b) (46 CFR 675.18)**.

- Institutions must spend from its own scholarship and student financial aid program at least one-third of its aid program expenditures under CWS.
  (20 U.S.C. 1094) (46 CFR 675.20)**

**Regulatory provision has potential for women, but current impact cannot be determined and/or is questionable.

Table 22

REGULATORY REVIEW OF THE GUARANTEED STUDENT LOAN PROGRAM

POLICIES RESTRICTING FEMALE PARTICIPATION IN POSTSECONDARY EDUCATION

- Eligibility is restricted to at least half time students.
  (20 U.S.C. 1077, 1078, 1085, 1088f) (44 CFR 177.201)

- Veterans Benefits may not be considered in calculating estimated financial assistance, yet other federal grant programs may be included - such as Aid to Families with Dependent Children and Food Stamps.
  (20 U.S.C. 1071 - 1087-4; 1088) (44 CFR 177.200)

- Child care costs are not explicitly allowed in calculating cost of attendance. Cost of attendance for GSL is defined as "the tuition and fees applicable to a student plus the school's estimate of other expenses reasonably related to attendance at that school. These costs include, but are not limited to, reasonable transportation and commuting costs, and costs for room, board, books and supplies."
  (20 U.S.C. 1071-1087-4; 1088) (44 CFR 177.200)

- A written statement required from a commercial lender in establishing aloan denial, so that a student may try to obtain a loan from an institution or lender of last resort, does not have to state the reason for loan denial.
  (20 U.S.C. 1075, 1078, 1082, 1083) (44 CFR 177.601(b))

- A student's sworn statement, required when a lender refuses to provide a written statement, for establishing a loan denial does not have to state the reason for being denied a loan.
  (20 U.S.C. 1075, 1078, 1082, 1083) (44 CFR 177.601(b))

- When recruiting students who have or will obtain a GSL, a school is required to present prospective students with a complete and accurate information about the school - including academic programs, the school's faculty, and school's facilities. No requirement is made to provide information that is of particular concern to women - such as number of female faculty and administrators, whether or not the campus has child care facilities, etc.
  (20 U.S.C. 1082, 1085, 1088f-1) (44 CFR 117.602)

- A proprietary institution which is required to provide prospective students information regarding the employment of students previously enrolled in those programs does not have to provide data regarding percentage of students hired upon graduation or average starting salaries of those students on the basis of gender.
  (20 U.S.C. 1082, 1085, 1088f-1) (44 CFR 177.602)

- The term "promote the availability" refers only to providing "prospective or enrolled students with application forms, names of eligible lenders, or other information designed to encourage persons to finance their education with a GSLP loan. This term does not include providing general financial aid information to prospective or enrolled students.
  (20 U.S.C. 1071-1087-4; 1088) (44 CFR 177.200)

- A National Defense or Direct Student Loan or Guaranteed Student Loan That is discharged in bankruptcy is considered to be in default.
  (20 U.S.C. 1077, 1078, 1085, 1088f) (44 CFR 177.201)

POLICIES FACILITATING FEMALE PARTICIPATION IN POSTSECONDARY EDUCATION

- To the extent that information is available, a proprietary school should provide a prospective student participating in GSL with information regarding the long range prospects for employment in the particular vocational, trade or career field that the student intends to prepare.
  (20 U.S.C. 1082, 1085, 1088f-1)(44 CFR 177.602)**

- A school that receives an administrative cost allowance payment shall use those funds first to provide student consumer information services.
  (20 U.S.C. 1078, 1082) (44 CFR 177.606)**
  (45 CFR 178)

- A school shall have a fair and equitable refund policy under which it will make a refund of unearned tuition, fees and room and board charges to a student who receives a GSL.
  (20 U.S.C. 1082, 1088f-1(a)(2)) (44 CFR 177.608)

- An unemployment deferrment may be granted to a person conscientiously seeking but unable to find full time employment over a single period of up to twelve months.
  (20 U.S.C. 1077, 1078, 1082; 42 U.S.C. 5055(e)) (44 CFR 177.508)

- Each guarantee agency may establish additional requirements within federal limits.
  (20 U.S.C. 1071 to 1087-4) (44 CFR 177.100)**

- The GSL is subject to the following statutes and regulations on prohibitions against discrimination: Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitiation Act of 1973, The Age Discrimination Act, and The Equal Credit Opportunity Act.
  (20 U.S.C. 1221e - 3(a)(1) (44 CFR 177.104)

- A student who is in default on a National Defense or Direct Student Loan may be eligible for a Guaranteed Student Loan if the student has made arrangements, satisfactory to the school, to repay the loan.
  (20 U.S.C. 1071 - 1087-4; 1088) (44 CFR 177.200)

**Regulatory provision has potential for women, but current impact cannot be determined and/or is questionable.

Table 26

REGULATORY REVIEW OF THE NATIONAL DIRECT STUDENT LOAN PROGRAM

POLICIES RESTRICTING FEMALE PARTICIPATION IN POSTSECONDARY EDUCATION

- When a student consolidates an NDSL and GSL loan with Sallie Mae, the student's loans are consolidated into one loan which is a GSL, thus he/she is no longer eligible for NDSL cancellation provisions.

(1982-83 Q&A Newsletter #2, June 27, 1983; U.S. Department of Education, p. 6)

POLICIES FACILITATING FEMALE PARTICIPATION IN POSTSECONDARY EDUCATION

- Teacher Cancellation Program. Individuals opting for this loan cancellation program have the entire amount of the loan plus the interest cancelled for teaching disadvantaged or handicapped students.

(20 U.S.C. 426 and 1087ee) (46 CFR 674.59).

- Head Start Cancellation Program. Individuals opting for this loan cancellation program are entitled to have the entire amount of a loan plus the interest cancelled if they undertake service as a full-time staff member in a Head Start program.

(20 U.S.C. 426 and 1087ee) (46 CFR 674.55).

- Loan repayment extension provision for low income individuals. An institution may extend the repayment period up to ten years for any student borrower who during the repayment period is a low-income individual during that repayment period. The term "low income individual" means an individual from a family whose taxable income for the preceding year did not exceed 150 percent of an amount equal to the poverty level determined by using criteria of poverty established by the Bureau of the Census.

(20 U.S.C. 425 and 1087dd.) (46 CFR 674.34a)

Table 30

REGULATORY REVIEW OF THE SUPPLEMENTAL EDUCATION OPPORTUNITY GRANT PROGRAM

POLICIES RESTRICTING FEMALE PARTICIPATION IN POSTSECONDARY EDUCATION

- Only undergraduate, full time students are eligible to apply. An institution may use not more than 10 percent of its allocation to award SEOGs to eligible students who are enrolled as less than half-time students, but is not required to do so.
  (20 U.S.C. 1070b-2 and 1091f) (46 CFR 676.9) (46 CFR 676.17)

- The Secretary considers a National Defense Student Loan, A National Direct Student Loan, a Guaranteed Student Loan, or a PLUS that is discharged in bankruptcy to be in default for SEOG.
  (20 U.S.C. 1070b-2 and 1091f) (46 CFR 676.9)

POLICIES FACILITATING FEMALE PARTICIPATION IN POSTSECONDARY EDUCATION

- Determination of cost of attendance does allow for a student with dependent children, an allowance based on the expenses "reasonably incurred" for child care.
  (20 U.S.C. 1089 (d)) (46 CFR 676.11)**

- An institution may pay an SEOG to a student who is in default on a Guaranteed Student Loan or a PLUS if the Secretary (for a federally insured loan) or a guarantee agency (for a loan insured by that guarantee agency) determines that the student has made satisfactory arrangements to repay the defaulted loan.
  (20 U.S.C. 1070b-2 and 1091f) (46 CFR 676.9)

- An institution may pay an SEOG to a student who is in default on a National Defense/Direct Student Loan made at that institution if the student has made arrangements, satisfactory to the institution to repay the loan.
  (20 U.S.C. 1070b-2 and 1091f) (46 CFR 676.9)

- For each award year it receives an SEOG allocation, an institution must spend from its own scholarship and student financial aid program at least one-third its aid program expenditures.
  (20 U.S.C. 1071) (46 CFR 676.20)**

**Regulatory provision has potential for women, but current impact cannot be determined and/or is questionable.

Table 34

REGULATORY REVIEW OF THE STATE STUDENT INCENTIVE GRANT PROGRAM

POLICIES RESTRICTING FEMALE PARTICIPATION IN POSTSECONDARY EDUCATION

No explicit restricting policies are identified in the SSIG regulations.

Funding levels on the part of the federal government are not enough to encourage state matching.

POLICIES FACILITATING FEMALE PARTICIPATION IN POSTSECONDARY EDUCATION

- A State determines whether a student has substantial financial need on the basis of criteria it establishes that are approved by the Secretary.**

  (20 U.S.C. 1070c-2.1089) (46 CFR 692.41)

- The Secretary does not consider a National Defense Student Loan, a National Direct Student Loan, or a Guaranteed Student Loan that is discharged in bankruptcy to be in default for purposes of this section.

  (20 U.S.C. 1070c-2.1091) (46 CFR 692.40)

- At state option, those enrolled less than full-time may receive reduced award amounts.**

- All Federal dollars go directly to students.

**Regulatory provision has potential for women, but current impact cannot be determined and/or is questionable.

APPENDIX H

PERCENTAGE PARTICIPATION IN STUDENT AID PROGRAMS

BY GENDER AND INSTITUTIONAL TYPE

1. Freshman Norm Survey
2. All Student Aid Programs (1981 - 1982)
3. All Student Aid Programs (1980 - 1981)
4. Pell Grant
5. College Work Study
6. Guaranteed Student Loan
7. National Direct Student Loan
8. Supplemental Educational Opportunity Grant

(H-1

Table 12

CHANGES IN PARTICIPATION RATES FOR STUDENT AID PROGRAMS BY GENDER[1]
1974, 1981

Gender	1974 % Aided	1981 % Aided	% Change in Prop.Aided[2]
		CWS Recipients	
Male	7.00	10.23	+29.5
Female	8.64	12.34	+42.8
		NDSL Recipients	
Male	5.62	6.92	+23.1
Female	5.99	7.57	+26.4
		GSL Recipients	
Male	7.26	25.04	+244.9
Female	6.26	23.67	+278.1
		SEOG Recipients	
Male	4.53	6.01	+32.7
Female	4.18	6.13	+46.7
		BEOG Recipients	
Male	17.66	24.03	+36.1
Female	16.71	26.97	+61.4
		Unduplicated Count	
Male	20.90	44.84	114.5
Female	20.32	47.28	132.7

[1]Percentages are based on total enrollments.

[2]Participation rates are for freshman students only.

Source: Freshman Norms: 1974, 1981. (Note: Includes both dependent and independent freshmen) in John Lee, Changing Characteristics of Student Aid Recipients 1974, 1981. Prepared for The National Commission on Student Financial Assistance.

Percentage Participation in Student Aid Program by Gender and Institutional Type[1]
(1981-82)

Sex	Type of Institution	% Grants	% Pell	% SEOG	% Loans	% NDSL	% GSL	% Any Work	% CWS
Male	Public 2-Yr	34.4	28.1	2.4	11.2	6.1	6.6	57.1	6.0
Female	Public 2-Yr	51.8	37.6	8.6	9.2	0.4	2.7	57.9	14.1
Male	Public 4-Yr	70.7	59.3	19.6	34.6	11.1	18.1	66.1	10.5
Female	Public 4-Yr	71.8	55.6	17.1	30.2	11.2	9.8	61.7	12.9
Male	Private 4-Yr	84.6	74.3	35.6	53.8	34.9	30.5	65.2	19.5
Female	Private 4-Yr	82.6	55.0	24.7	54.0	35.1	22.4	56.7	18.0
Male	Vocational[2]	54.5	23.2	2.3	17.3	0.0	16.7	41.6	2.3
Female	Vocational	52.0	42.1	2.5	26.7	2.9	6.5	37.0	1.8
Male	All	35.7	46.4	4.8	30.2	7.0	15.6	59.8	6.4
Female	All	39.3	48.5	6.1	33.6	8.9	9.0	58.6	9.3

[1] The base for percentages is all low income (less than $12,000) 1980 high school seniors enrolled in post-secondary education in 1981-82.

[2] Category includes all vocational and technical institutions as well as including proprietary institutions.

Source: U.S. Department of Education, Tabulations prepared by Longitudinal Studies Branch, National Center for Educational Statistics, The High School and Beyond Data, 83-9-8.

Table 3

H-2

Percentage Participation in the Pell Grant Program by Type of Institution[1]

Low Income	Public 2-Year		Public 4-Year		Private 4-Year		Vocational[2]		All Institutions	
	1980-81	1981-82	1980-81	1981-82	1980-81	1981-82	1980-81	1981-82	1980-81	1981-82
Male	41.6	28.1	66.2	59.3	77.5	74.3	28.0	23.2	54.9	46.4
Female	48.5	37.6	73.3	55.6	71.1	55.0	38.2	42.1	61.8	48.5
Moderate Income										
Male	19.7	13.8	29.5	23.7	41.6	32.5	13.7	11.7	27.6	21.6
Female	18.2	15.9	39.3	30.2	47.3	31.7	19.3	18.2	30.3	24.3
High Income										
Male	6.4	6.3	6.5	5.9	9.5	10.3	4.9	7.1	7.4	7.4
Female	4.5	5.5	10.2	9.6	7.6	9.1	2.9	9.6	7.6	8.4

[1] The base for percentages is all low income (less than $12,000), moderate income ($12,000-$19,000), and high income ($20,000 and above) 1980 high school seniors enrolled in post-secondary education in 1980-81 and 1981-82.

[2] Category includes all vocational and technical institutions as well as including proprietary institutions.

Source: U.S. Department of Education, Tabulations prepared by Longitudinal Studies Branch, National Center for Educational Statistics, The High School and Beyond Data, 83-9-8.

C-3

4-4

Percentage Participation in the College Work Study Program by Type of Institution[1]

Low Income	Public 2-Year		Public 4-Year		Private 4-Year		Vocational[2]		All Institutions	
	1980-81	1981-82	1980-81	1981-82	1980-81	1981-82	1980-81	1981-82	1980-81	1981-82
Male	7.6	6.0	11.9	10.5	20.5	19.5	1.8	2.3	10.8	9.3
Female	8.6	14.1	15.9	12.9	23.3	18.0	9.2	1.8	13.5	12.8
Moderate Income										
Male	4.8	6.1	8.4	6.0	18.0	17.0	2.5	1.8	8.5	7.7
Female	3.3	3.7	8.8	9.3	22.1	27.7	3.2	0.0	8.3	9.9
High Income										
Male	2.6	3.3	4.3	3.3	6.9	6.8	0.5	3.9	4.2	4.2
Female	2.0	1.5	3.5	5.0	9.7	14.6	0.3	0.0	5.1	6.9

[1] The base for percentages is all low income (less than $12,000), moderate income ($12,000-$19,000), and high income ($20,000 and above) 1980 high school seniors enrolled in post-secondary education in 1980-81 and 1981-82.

[2] Category includes all vocational and technical institutions as well as including proprietary institutions.

Source: U.S. Department of Education, Tabulations prepared by Longitudinal Studies Branch, National Center for Educational Statistics, The High School and Beyond Data, 83-9-8.

Percentage Participation in the Guaranteed Student Loan Program by Type of Institution[1]

Low Income	Public 2-Year		Public 4-Year		Private 4-Year		Vocational[2]		All Institutions	
	1980-81	1981-82	1980-81	1981-82	1980-81	1981-82	1980-81	1981-82	1980-81	1981-82
Male	2.0	6.6	12.3	18.1	23.9	30.5	3.9	16.7	9.5	15.6
Female	1.5	2.7	4.4	9.8	10.7	22.4	5.7	6.5	4.4	9.0
Moderate Income										
Male	5.9	8.6	16.9	23.7	16.3	22.2	3.6	13.4	11.8	17.6
Female	8.3	8.9	13.3	15.3	19.3	24.0	14.7	19.1	12.7	15.0
High Income										
Male	6.8	8.2	16.0	14.3	31.8	32.7	4.3	9.6	16.6	16.9
Female	4.0	2.6	17.4	20.1	23.7	25.0	13.1	19.1	16.3	18.1

[1] The base for percentages is all low income (less than $12,000), moderate income ($12,000-$19,000), and high income ($20,000 and above) 1980 high school seniors enrolled in post-secondary education in 1980-81 and 1981-82.

[2] Category includes all vocational and technical institutions as well as including proprietary institutions.

Source: U.S. Department of Education, Tabulations prepared by Longitudinal Studies Branch, National Center for Educational Statistics, The High School and Beyond Data, 83-9-8.

Percentage Participation in the National Direct Student Loan Program by Type of Institution[1]

Low Income	Public 2-Year		Public 4-Year		Private 4-Year		Vocational[2]		All Institutions	
	1980-81	1981-82	1980-81	1981-82	1980-81	1981-82	1980-81	1981-82	1980-81	1981-82
Male	3.7	6.1	15.3	11.1	31.9	34.9	15.7	0.0	13.5	12.1
Female	2.4	0.4	22.5	11.2	36.8	35.1	3.4	2.9	16.3	10.2
Moderate Income										
Male	2.7	1.3	12.9	8.5	31.2	22.8	6.5	1.4	12.7	8.5
Female	1.0	3.2	12.0	8.6	29.4	22.9	6.3	0.6	10.5	9.1
High Income										
Male	1.0	2.9	6.8	2.9	8.1	2.9	4.3	5.5	5.5	3.9
Female	3.1	2.8	5.3	6.0	17.0	15.6	3.8	6.6	7.9	7.9

[1] The base for percentages is all low income (less than $12,000), moderate income ($12,000-$19,000), and high income ($20,000 and above) 1980 high school seniors enrolled in post-secondary education in 1980-81 and 1981-82.

[2] Category includes all vocational and technical institutions as well as including proprietary institutions.

Source: U.S. Department of Education, Tabulations prepared by Longitudinal Studies Branch, National Center for Educational Statistics, The High School and Beyond Data, 83-9-8.

H-7

Percentage Participation in the Supplemental Educational Opportunity Grant Program by Type of Institution[1]

Low Income	Public 2-Year		Public 4-Year		Private 4-Year		Vocational[2]		All Institutions	
	1980-81	1981-82	1980-81	1981-82	1980-81	1981-82	1980-81	1981-82	1980-81	1981-82
Male	6.7	2.4	28.0	19.6	42.1	35.6	1.9	2.3	19.6	13.9
Female	6.4	8.6	21.9	17.1	31.6	24.7	6.1	2.5	16.9	13.9
Moderate Income										
Male	1.4	0.8	8.2	7.2	15.5	12.2	2.3	1.8	6.7	5.5
Female	0.8	2.1	5.8	6.3	15.2	15.8	5.9	2.6	5.4	6.2
High Income										
Male	0.9	1.0	0.4	0.3	4.4	3.2	3.8	4.6	1.9	1.7
Female	1.9	1.0	3.3	2.0	4.1	6.0	0.3	1.1	3.2	2.7
All Income										
Male	2.0	1.1	6.6	5.2	12.7	9.8	2.8	3.0	6.2	4.8
Female	2.0	3.0	7.2	6.2	12.6	12.4	4.7	2.3	6.4	6.1

[1] The base for percentages is all low income (less than $12,000), moderate income ($12,000-$19,000), and high income ($20,000 and above) 1980 high school seniors enrolled in post-secondary education in 1980-81 and 1981-82.

[2] Category includes all vocational and technical institutions as well as including proprietary institutions.

Source: U.S. Department of Education, Tabulations prepared by Longitudinal Studies Branch, National Center for Educational Statistics, The High School and Beyond Data, 83-9-3.

8-H

APPENDIX I

DEPENDENT FRESHMAN PARTICIPATION PATTERNS IN FEDERAL STUDENT AID PROGRAMS

1. Pell Grant
2. College Work Study
3. Guaranteed Student Loan
4. National Direct Student Loan
5. Supplemental Educational Opportunity Grant

Table 15

PARTICIPATION IN THE PELL PROGRAM BY GENDER
FOR FIRST TIME FULL TIME DEPENDENT STUDENTS FALL 1982

	$1 - 5,999	$6,000 14,999	$15,000 24,999	$25,000 39,000	$40+	All
Male						
% Participating	57.6	53.8	33.5	13.5	5.0	22.8
Ave. Per Recipient	$1,176	$1,016	$ 797	$ 801	$ 963	$ 913
Female						
% Participating	61.9	53.2	34.7	13.5	4.6	25.5
Ave. per Recipient	$1,107	$ 970	$ 754	$ 740	$ 881	$880
All Students						
% Participating	60.1	53.5	34.1	13.5	4.8	24.1
Ave. per Recipient	$1,135	$ 991	$ 775	$ 772	$ 927	$ 896

Source: U.S. Department of Education. Secondary Data Analysis of Cooperative Institutional Research Program - Fall, 1982. Office of Planning, Budget and Evaluation; Postsecondary Evaluation Service; Student and Institutional Aid Division.

Table 16

AVERAGE FRESHMAN DEPENDENT PELL GRANT AWARDS

Top Twenty Academic Rank

	0-10K	10K-20K	20K-30K	30K-40K	40K+	Total
Male						
Average Per Recipient	$1159	$916	$761	$857	$944	$912
% of cost covered	22.05	17.20	14.28	15.43	14.79	16.10
% Participating	61.7	49.2	23.8	11.0	5.8	22.6
Female						
Average Per Recipient	$1088	$870	$711	$767	$880	$869
% of cost covered	21.71	17.12	13.65	14.18	13.94	15.86
% Participating	63.7	49.7	25.1	10.9	5.2	25.4

Source: Cooperative Institutional Research Program of the University of California, Los Angeles and the American Council on Education.. Freshman Norm Survey-Fall, 1982.

Table 19

PARTICIPATION IN THE CWS PROGRAM BY SEX
FOR FIRST TIME FULL TIME DEPENDENT STUDENTS FALL 1982

	$1 - 5,999	$6,000 14,999	$15,000 24,999	$25,000 39,000	$40+	All
Male						
% Participating	22.1	19.8	15.1	10.3	4.7	11.6
Ave. Per Recipient	$ 705	$ 725	$ 748	$ 771	$ 814	$ 754
Female						
% Participating	22.5	21.7	18.1	12.4	4.5	13.7
Ave. per Recipient	$ 668	$ 682	$ 714	$ 724	$ 735	$707
All Students						
% Participating	22.3	20.9	16.6	11.3	4.6	12.7
Ave. per Recipient	$ 684	$ 700	$ 730	$ 748	$ 778	$ 729

Source: U.S. Department of Education. Secondary Data Analysis of Cooperative Institutional Research Program - Fall, 1982. Office of Planning, Budget and Evaluation; Postsecondary Evaluation Service; Student and Institutional Aid Division.

Table 20

AVERAGE FRESHMAN DEPENDENT COLLEGE WORK STUDY

Top Twenty Academic Rank

	0-10K	10K-20K	20K-30K	30K-40K	40K+	Total
Male						
Average Per Recipient	$789	$808	$825	$839	$920	$830
% of cost covered	15.0	15.17	15.50	15.11	14.41	14.65
% Participating	24.8	21.7	16.2	12.0	5.8	13.8
Female						
Average Per Recipient	$738	$737	$763	$769	$770	$753
% of cost covered	14.72	14.50	14.64	14.22	12.19	13.74%
Participating	26.2	25.1	19.7	13.6	5.5	16.5

Source: Cooperative Institutional Research Program of the University of California, Los Angeles and the American Council on Education. Freshman Norm Survey-Fall, 1982.

Table 23

PARTICIPATION IN THE GSL PROGRAM BY SEX
FOR FIRST TIME FULL TIME DEPENDENT STUDENTS FALL 1982

	$1 - 5,999	$6,000 14,999	$15,000 24,999	$25,000 39,000	$40+	All
Male						
% Participating	24.6	28.3	27.5	25.1	11.4	22.4
Ave. Per Recipient	$1,501	$1,547	$1,692	$1,681	$1,710	$1,658
Female						
% Participating	20.7	25.8	26.9	25.2	12.2	22.4
Ave. per Recipient	$1,571	$1,564	$1,661	$1,696	$1,710	$1,658
All Students						
% Participating	22.4	26.9	27.2	25.2	11.8	22.4
Ave. per Recipient	$1,538	$1,556	$1,677	$1,688	$1,710	$1,657

Source: U.S. Department of Education. Secondary Data Analysis of Cooperative Institutional Research Program - Fall, 1982. Office of Planning, Budget and Evaluation; Postsecondary Evaluation Service; Student and Institutional Aid Division.

Table 24

AVERAGE FRESHMAN DEPENDENT STUDENT SUPPORT - GUARANTEED STUDENT LOANS

Top Twenty Academic Rank

	0-10K	10K-20K	20K-30K	30K-40K	40K+	Total
Male						
Average Per Recipient	$1673	$1762	$1878	$1793	$1876	$1817
% of cost covered	31.81	33.08	35.25	32.29	29.39	32.06
% Participating	26.2	28.2	27.5	23.6	11.9	22.3
Female						
Average Per Recipient	$1733	$1746	$1842	$1811	$1905	$1812
% of cost covered	34.57	34.36	35.36	33.48	30.17	33.06
% Participating	22.8	26.9	28.8	23.5	13.0	22.9

Source: Cooperative Institutional Research Program of the University of California, Los Angeles and the American Council on Education. Freshman Norm Survey-Fall, 1982.

Table 27

PARTICIPATION IN THE NDSL PROGRAM BY SEX
FOR FIRST TIME FULL TIME DEPENDENT STUDENTS FALL 1982

	$1 - 5,999	$6,000 14,999	$15,000 24,999	$25,000 39,000	$40+	All
Male						
% Participating	8.7	11.2	9.0	5.8	2.0	6.3
Ave. Per Recipient	$ 879	$ 983	$1,095	$1,183	$1,311	$1,102
Female						
% Participating	9.1	10.5	10.0	6.7	2.1	7.1
Ave. per Recipient	$ 964	$ 994	$1,087	$1,185	$1,278	$1,097
All Students						
% Participating	9.0	10.8	9.5	6.2	2.0	6.7
Ave. per Recipient	$ 929	$ 989	$1,091	$1,184	$1,295	$1,100

Source: U.S. Department of Education. Secondary Data Analysis of Cooperative Institutional Research Program - Fall, 1982. Office of Planning, Budget and Evaluation; Postsecondary Evaluation Service; Student and Institutional Aid Division.

Table 28

AVERAGE FRESHMAN DEPENDENT STUDENT SUPPORT -NDSL

Top Twenty Academic Rank

	0-10K	10K-20K	20K-30K	30K-40K	40K+	Total
Male						
Average Per Recipient	$964	$1021	$1098	$1145	$1302	$1085
% of cost covered	18.33	19.17	20.61	20.62	20.41	19.14
% Participating	13.6	14.0	10.3	6.2	2.3	8.0
Female						
Average Per Recipient	$989	$1019	$1124	$1123	$1294	$1087
% of cost covered	19.73	20.06	21.58	20.75	20.50	19.83
% Participating	12.2	12.8	10.6	6.4	2.5	8.3

Source: Cooperative Institutional Research Program of the University of California, Los Angeles and the American Council on Education. Freshman Norm Survey-Fall, 1982.

I-5

Table 31

PARTICIPATION IN THE SEOG PROGRAM BY SEX
FOR FIRST TIME FULL TIME DEPENDENT STUDENTS FALL 1982

	$1 - 5,999	$6,000 14,999	$15,000 24,999	$25,000 39,000	$40+	All
Male						
% Participating	16.7	13.6	7.7	3.5	1.2	5.7
Ave. Per Recipient	$ 773	$ 738	$ 670	$ 752	$ 813	$ 729
Female						
% Participating	15.5	13.3	7.7	3.7	1.0	6.1
Ave. per Recipient	$ 810	$ 730	$ 701	$ 683	$814	$727
All Students						
% Participating	16.0	12.9	7.7	3.6	1.1	5.9
Ave. per Recipient	$ 794	$ 734	$ 685	$ 719	$ 814	$ 728

Source: U.S. Department of Education. Secondary Data Analysis of Cooperative Institutional Research Program - Fall, 1982. Office of Planning, Budget and Evaluation; Postsecondary Evaluation Section; Student and Institutional Aid Division.

Table 32

AVERAGE FRESHMAN DEPENDENT STUDENT SUPPORT -SEOG

Top Twenty Academic Rank

	0-10K	10K-20K	20K-30K	30K-40K	40K+	Total
Male						
Average Per Recipient	$790	$702	$750	$971	$886	$755
% of cost covered	15.04	13.19	14.08	14.24	13.89	13.31
% Participating	17.0	12.5	7.3	3.6	1.3	6.3
Female						
Average Per Recipient	$787	$708	$676	$743	$870	$726
% of cost covered	15.7	13.94	12.97	13.74	13.79	13.25
% Participating	14.5	12.3	7.1	3.4	1.3	6.5

Source: Cooperative Institutional Research Program of the University of California, Los Angeles and the American Council on Education. Freshman Norm Survey-Fall, 1982.

I-6

Table 35

AVERAGE FRESHMAN DEPENDENT STUDENT SUPPORT-STATE SCHOLARSHIPS OR GRANTS

Top Twenty Academic Rank

	0-10K	10K-20K	20K-30K	30K-40K	40K+	Total
Male						
Average Per Recipient	$857	$725	$715	$773	$734	$747
% of cost covered	16.31	13.62	13.43	13.91	11.50	13.18
% Participating	36.1	33.1	23.4	15.1	8.9	19.9
Female						
Average Per Recipient	$807	$742	$699	$721	$706	$731
% of cost covered	16.11	14.61	13.41	13.33	11.18	13.34
% Participating	35.2	32.1	25.9	16.2	10.0	21.9

Source: Cooperative Institutional Research Program of the University of California, Los Angeles and the American Council on Education. Freshman Norm Survey-Fall, 1982.

N=?

APPENDIX J

GUIDELINES FOR DETERMINING STUDENT FINANCIAL AID EQUITY IN LOCAL EDUCATION AGENCIES AND INSTITUTIONS OF HIGHER EDUCATION

FINANCIAL ASSISTANCE

Self-Evaluation: An Outline

In order to assess and evaluate present compliance with the requirements of the Title IX Regulation for nondiscrimination in financial assistance and to plan necessary modifications, it will be necessary to:

Review the following materials:

- copies of all policies pertaining to the administration of financial assistance for students
- copies of all legal instruments (or relevant portions thereof) establishing scholarships or other awards of financial assistance administered by the agency/schools
- copies of all agreements with organizations or individuals providing financial assistance to students which is administered by the agency/schools
- copies of criteria for student eligibility/selection for all awards of financial aid
- copies of student handbooks and any descriptive materials pertaining to financial assistance to students
- copies of any application materials used in the process of awarding financial assistance

(Note: Review of the above should include those materials which pertain to athletic scholarships.)

Collect the following data:

- list of all awards of financial assistance made to students during the past school year, by:

  –sex of each recipient
  –amount of award
  –criteria for selection
  –description of agency/school involvement in selection process

(Note: This list should include any athletic scholarships administered by the agency/school.)

Determine compliance by answering the following questions:

- Is financial assistance awarded to males and females without discrimination on the basis of sex in amount, type or criteria for eligibility/selection?
- Are all students selected for non-athletic financial assistance according to the same process and based on standards developed and applied without regard to sex?
- If legally sex-restricted funds are administered by the education agency in providing financial assistance to students:

  –is selection of students for financial assistance based upon objective criteria which do not discriminate on the basis of sex?

–if there are not sufficient sex-restricted funds to be awarded to students of a particular sex so selected, does the school or district obtain sufficient funds for the excluded students or not award the sex-restricted funds?

- Do all descriptive materials make clear that non-athletic financial assistance is available to males and females in comparable amounts according to identical criteria?

- Are materials and forms used by students in applying for financial assistance the same for females and males and free from any items which discriminate on the basis of sex?

- Are athletic scholarships:

  –available to males and females in reasonable proportion to the participation of each sex in interscholastic athletics; *or*

  –awarded to students based upon sex-neutral criteria applied to members of both sexes?

- Do all descriptive materials regarding athletic scholarships reflect the availability of athletic scholarships to males and females according to the nondiscriminatory process selected by the education agency/school for their administration?

If you have answered "no" to any of these questions, you will need to undertake modifications and remedial steps to achieve compliance with Title IX.

Self-Evaluation: Action Checklists

Self-evaluation is a process involving staff at all levels of the institution or agency. The following checklists provide general suggestions to personnel at the central administrative, building administrative, and building staff levels as to procedures and review questions which facilitate effective evaluation of compliance with Title IX requirements for nondiscrimination in financial assistance. **(Note: These checklists are procedural only; substantive criteria for evaluating compliance are provided in the preceding section, "Self-Evaluation: An Outline.")**

Central Office Staff

- Has a policy statement been issued which affirms the right of every student to eligibility for financial assistance without regard to sex? Yes ☐ No ☐
- Has a policy directive regarding the specific implications of Title IX for agency financial assistance programs and practices been disseminated to administrators and relevant staff? Yes ☐ No ☐
- Have forms, procedures and timelines been developed and disseminated for submission to the central office by building administrators of:
  - –assurances of notification of all organizations or individuals providing funds for student financial assistance administered by the school of the school's obligation to provide financial assistance without regard to sex in compliance with Title IX requirements? Yes ☐ No ☐
  - –assurances of review of all school policies regarding financial assistance and modification where necessary to ensure compliance with Title IX? Yes ☐ No ☐
  - –assurances of review of all criteria pertaining to the eligibility or selection of students for financial assistance administered by the school and modification where necessary to ensure compliance with Title IX? Yes ☐ No ☐
  - –assurances of review of all procedures pertaining to the selection of students for financial assistance and modification where necessary to ensure compliance with Title IX? Yes ☐ No ☐
  - –assurances of review of all descriptive materials issued by the school regarding financial assistance to students (including student handbooks) and modification where necessary to reflect compliance with Title IX? Yes ☐ No ☐
  - –assurances of review of all forms used by students in applying for financial assistance and modification where necessary to ensure compliance with Title IX? Yes ☐ No ☐
  - –assurances that all the above actions include consideration of both non-athletic and athletic financial assistance programs? Yes ☐ No ☐

- Has a statement regarding district compliance with the requirements of the Title IX Regulation been disseminated to all organizations or individuals providing funds for student financial aid which are administered by the district? Yes ☐ No ☐

- Have all district policies regarding financial assistance to students been reviewed and modified where necessary to ensure compliance with Title IX? Yes ☐ No ☐

- Have all criteria established by the district pertaining to the eligibility or selection of students for financial assistance been reviewed and modified where necessary to ensure compliance with Title IX? Yes ☐ No ☐

- Have all procedures or procedural guidelines pertaining to the selection of students for financial assistance been reviewed and modified where necessary to ensure compliance with Title IX? Yes ☐ No ☐

- Have all descriptive materials issued by the district regarding financial assistance to students (including student handbooks) been modified where necessary to reflect compliance with Title IX? Yes ☐ No ☐

- Have all application forms used by students in obtaining financial assistance been reviewed and modified where necessary to ensure nondiscrimination on the basis of sex? Yes ☐ No ☐

- Do all the above actions include consideration of both non-athletic and athletic financial assistance and/or scholarship programs? Yes ☐ No ☐

- Has every building administrator submitted all required data and assurances to the central office according to the specified timeline? Yes ☐ No ☐

FINANCIAL ASSISTANCE

Building Administrators (Principals/Supervisors)

- Has a policy directive regarding the specific implications of Title IX for school financial assistance programs been developed and distributed to all staff with responsibility for the selection of students for financial aid or for the administration of school financial assistance programs/funds? Yes ☐ No ☐

- Have you requested that all building staff submit information concerning any instances of sex discrimination in policies, practices or materials relating to student financial assistance? Yes ☐ No ☐

- Have you prepared the following and submitted them to the central administration according to specified format and timelines:

  –assurances of notification of all organizations or individuals providing funds for student financial assistance administered by the school of the school's obligation to provide financial assistance without regard to sex in compliance with Title IX requirements? Yes ☐ No ☐

  –assurances of review of all school policies regarding financial assistance and modification where necessary to ensure compliance with Title IX? Yes ☐ No ☐

  –assurances of review of all criteria pertaining to the eligibility or selection of students for financial assistance administered by the school and modification where necessary to ensure compliance with Title IX? Yes ☐ No ☐

  –assurances of review of all procedures pertaining to the selection of students for financial assistance and modification where necessary to ensure compliance with Title IX? Yes ☐ No ☐

  –assurances of review of all descriptive materials issued by the school regarding financial assistance to students (including student handbooks) and modification where necessary to reflect compliance with Title IX? Yes ☐ No ☐

  –assurances of review of all forms used by students in applying for financial assistance and modification where necessary to ensure compliance with Title IX? Yes ☐ No ☐

  –assurances that all of the above actions include consideration of both non-athletic and athletic financial assistance programs? Yes ☐ No ☐

Building Staff (Student Personnel Workers, Counselors, Instructors and Athletic Staff with Responsibility for Student Financial Assistance)

- Have you familiarized yourself with the implications of Title IX requirements for nondiscrimination in student financial assistance programs for which you have responsibility? Yes ☐ No ☐
- Do you select students for awards of financial assistance on the basis of criteria which comply with Title IX requirements for nondiscrimination? Yes ☐ No ☐
- Do you select students for awards of financial assistance according to procedures which comply with Title IX requirements for nondiscrimination? Yes ☐ No ☐
- Have you reviewed all descriptive materials pertaining to financial assistance for which you have responsibility and modified them where necessary to reflect compliance with Title IX? Yes ☐ No ☐
- Have you reviewed all forms used by students in applying for financial assistance for which you have responsibility and modified them where necessary to ensure compliance with Title IX? Yes ☐ No ☐
- Have you submitted to your building administrator information concerning any instances of sex discrimination that you have identified in policies, practices, or materials relating to student financial assistance? Yes ☐ No ☐

Source: Marla Matthews and Shirley McCune, Complying with Title IX: Implementing Institutional Self-Evaluation. Washington, D.C.: U.S. Department of Health, Education, and Welfare, 1974

II. For Institutions of Higher Education

FINANCIAL AID

Rationale for Topic: Students are sometimes denied access to higher education on the basis of lack of financial aid. Sex inequities occur when financial aid is differentially awarded on the basis of sex related criteria. For example, there are cases where women have been denied student loans because of their anticipated lower potential for paying them back; where men have been awarded graduate fellowships and equally qualified or superior women were awarded assistantships; and where account has not been taken of the greater financial obligations of older students, who are increasingly women, in evaluating financial aid applicants.

Rationale for Items 1-11: In administering financial aid programs, institutions can ensure that students are aware of all potential sources of aid and that the limited resources are fairly distributed by commonly applied standards of need or ability.

YES	NO	DON'T KNOW	N/A		
☐	☐	☐	☐	1.	Are students notified of all available financial aid and the criteria of eligibility for each type of aid through the catalogue or other student publications?
☐	☐	☐	☐	2.	Are prospective students notified of all available financial aid in recruitment materials?
☐	☐	☐	☐	3.	Is financial aid available to both full-time and part-time students?
☐	☐	☐	☐	4.	Are efforts being made to make financial aid more readily available to part-time students?
☐	☐	☐	☐	5.	Is financial aid counseling available both to full- and part-time students?
☐	☐	☐	☐	6.	Are a variety of communications channels (e.g., posting in continuing education center, publication in campus newspaper, dissemination of student brochures) used to inform all students of the availability of financial aid counseling and the types of aid for which counseling may be available?
☐	☐	☐	☐	7.	Is the scholarship budget for student athletes divided between the men and women according to the participation rates of each sex?

YES	NO	DON'T KNOW	N/A	
				8. Are child care costs taken into account in assessing financial need?
☐	☐	☐	☐	a. For non-federal grants and loans?
☐	☐	☐	☐	b. For federal grants and loans, where allowed?
				9. Are statistics compiled annually on the number of men and women by race, ethnicity, and age who apply for and receive each of the following types of financial aid?
☐	☐	☐	☐	a. Undergraduate need-based grants.
☐	☐	☐	☐	b. Undergraduate or graduate loans.
☐	☐	☐	☐	c. Work study aid.
☐	☐	☐	☐	d. Graduate fellowships.
☐	☐	☐	☐	e. Graduate traineeships.
☐	☐	☐	☐	f. Graduate teaching assistantships.
☐	☐	☐	☐	g. Research assistantships.
				10. Are these statistics used for the following purposes?
☐	☐	☐	☐	a. Dissemination to appropriate deans and other institutional official responsible for equitable distribution of financial aid?
☐	☐	☐	☐	b. Development or revision of standardized procedures and policies for awarding financial aid?
☐	☐	☐	☐	11. Are reviews conducted annually to determine the possibility of sex bias in decisions and practices related to financial aid awards?

FOOTNOTES

CHAPTER I: INTRODUCTION

[1]The National Commission on Student Financial Assistance, Transcripts of Commission meeting - Washington, D. C. August, 1982. pp. 119 - 120.

[2]David Saxon, Chairman of the Corporation, MIT and President Emeritus, University of California. General Session Address - 97th Annual Meeting of the National Association of State Universities and Land-Grant Colleges. Washington, D. C. November 15, 1983.

[3]Esther Westervelt, Barriers to Women's Participation in Postsecondary Education: A Review of Research and Commentary as of 1973-74. Washington, D. C.: National Center for Education Statistics, 1975. p. 12.

[4]U.S. Department of Education, National Longitudinal Study of the High School and Beyond Survey. Washington, D. C.: National Center for Educaton Statistics, 1982.

[5]Mark Blaug, "Cost-Benefit Analysis: the Social Calculus," in An Introduction to the Economics of Education. Baltimore; Penguin Books, 1972.

[6]Andrew Kolstad, "Does College Pay? Wage Rates Before and After Leaving School" Washington, D. C.: National Center for Education Statistics. November, 1982.

[7]Ibid.

[8]National Commission on Student Financial Assistance, Access and Choice: Equitable Financing of Postsecondary Education (Report #7) Report of the Sources of Funds Subcommittee. Washington, D. C. August, 1983

[9]U.S. Department of Education, A Nation At Risk: The Imperative for Educational Reform. Washington, D. C.: The National Commission on Excellence in Education, 1983. p. 7.

[10]The Carnegie Commission on Higher Education, Higher Education: Who Pays? Who Benefits? Who Should Pay? New York: McGraw-Hill Book Company, 1973.

[11]Andree Brooks, "For the Woman: Strides and Snags", National Employment Report. The New York Times. October 16, 1983. p. 31.

[12]Davis, Jerry. "Paying for College Costs: Does The Student's Sex Make A Difference?" The Journal of Student Financial Aid (Vol. 7, No. 3), November, 1977. pp. 21-34.

[13]Alexander Astin, Financial Aid and Student Persistence. University of California, Los Angeles: Higher Education Research Institute, 1975. p. 9.

[14]Ibid

[15]Abramovitz, Mimi. Where are the Women? A Study of Worker Underutilization of Tuition Refund Plans. Cornell University - Institute for Education and Research on Women and Work. December, 1977.

[16]U.S. Department of Education, The Condition of Education (1983 Edition) Washington, D. C.: National Center for Education Statistics. pp. 136-137.

[17]Conference Report: To Accompany H.R. 5192. The Education Amendments of 1980. U.S. House of Representatives, Ninety-Sixth Congress, Second Session. August 15, 1980. pp. 139 - 142.

[17]The National Commission on Student Financial Assistance, Signs of Trouble and Erosion: A Report on Graduate Education in America, Washington, D. C., December 1, 1983. p. 80.

[18]Nancy Campbell, Marcia Greenberger, Margaret Kohn and Shirley Wilcher, Sex Discrimination in Education: Legal Rights and Remedies. Washington, D. C.: National Women's Law Center, 1983. pp. 4-4 to 4-7.

[19]Testimony of Lilli A. Hornig, Executive Director, Higher Education Resource Services before The National Commission on Student Financial Assistance. Subcommittee on Graduate Education Hearing. New York University, New York. March 15, 1983. pp. 243-244.

[20]Herbert Flamer, Dwight Horch and Susan Davis, Talented and Needy Graduate and Professional Students: A National Survey of People Who Applied for Need-Based Financial Aid to Attend Graduate School or Professional School in 1980 - 81. Princeton, New Jersey: Educational Testing Service. April, 1982.

[21]Paul Butler-Nalin, Allen R. Sanderson, and David N. Redman, Financing Graduate Education: Graduate Student Borrowing, Needs of the Disadvantaged and Underrepresented, and the Climate for Graduate Study. Washington, D. C.: The Consortium on Financing Higher Education (COFHE). Prepared for The National Commission on Student Financial Assistance. February, 1983.

[22]National Commission on Student Financial Assistance, Signs of Trouble and Erosion: A Report on Graduate Education in America, Washington, D. C., December 1, 1983. p. 80.

[22] American Association of Community and Junior Colleges; American Association of State Colleges and Universities, and The National Association of State Universities and Land-Grant Colleges, Low Tuition Factbook: Eight Basic Facts About Tuition and Educational Opportunity. Washington, D. C. September, 1983.

[23]Jacob Stampen, Student Aid and Public Higher Education: A Progress Report. Washington, D. C.: The American Association of Community and Junior Colleges, The American Association of State Colleges and Universities, and The National Association of State Universities and Land Grant Colleges. January, 1983. pp. 25-27.

[23]American Association of State Colleges and Universities, Women's Stake in Low Tuition. (in cooperation with American Association of Community and Junior Colleges, American Association of University Women, American Association of Women in Community and Junior Colleges, American Federation of Labor-Congress of Industrial Organizations, American Federation of Teachers, A.F.L.-C.I.O., Interstate Commission on The Status of Women, National Student Association, National Student Lobby, Resource Center on Sex Roles in Education, National Foundation for the Improvement of Education, and the Women's Equity Action League). Washington, D. C. October, 1974.

[24]Dorothy Cann, "Proprietary Vocational Schools: An Alternative Education Lifestyle for the Disenchanted/Disadvantaged", in Robert E. Taylor (ed.) Job Training for Youth. The National Center for Research in Vocational Education Columbus, Ohio: The Ohio State University, 1982. p. 444.

[25]Wellford Wilms, Survey of Student Financial Aid Recipients at Proprietary Institutions. Prepared for The National Commission on Student Financial Assistance. Washington, D. C. March, 1983

[26]Wellford Wilms, Proprietary Vocational Schools: A Significant Sector of American Postsecondary Education. Prepared for The National Commission on Student Financial Assistance. Washington, D. C. August, 1982. p. 17.

[27]Virginia Hodgkinson and Julianne Still Thrift, Recent Trends in Financial Aid to Students Attending Independent Colleges and Universities. Washington, D. C.: National Institute of Independent Colleges and Universities. August, 1982. p. 1 - 2.

[28]Julianne Still Thrift and Christopher Toppe, Diminished Access: Fall 1982 Enrollment at Independent Colleges and Universities. Washington, D. C.: National Institute of Independent Colleges and Universities. December, 1982. p. 12.

[29]John Phillips, President of The National Association of Independent Colleges and Universities and The National Institute of Independent Colleges and Universities. Testimony before the Subcommittee on Postsecondary Education, Committee on Eduction and Labor. U.S. House of Representatives. October 19, 1983.

[30]"The Feminization of Poverty" Graduate Woman (Volume 77, Number 7) Washington, D. C.: American Association of University Women. November/December, 1983.

[30]Donald Gillespie and Nancy Carlson, Trends in Student Aid: 1963 to 1983. Washington, D. C.: The College Board. December, 1983.

[31]Carol Frances. The Effects of Inflation on Student Financial Aid Policy Results. Testimony before the Sources of Funds Subcommittee. The National Commission on Student Financial Assistance. University of Chicago. Chicago, Illinois. February 7, 1983.

[32]Ibid.

CHAPTER II IMPACT OF TITLE IX LEGISLATION ON STUDENT FINANCIAL ASSISTANCE: CHANGING INSTITUTIONAL POLICIES AND PRACTICES

[1]U.S. Supreme Court, Decision in Grove City College vs. Bell. February 28, 1984.

[2]U.S. Department of Education, Office for Civil Rights: Second Annual Report. Washington, D. C. March, 1983. p. 12.

[3]Nancy Campbell, Marcia Greenberger, Margaret Kohn and Shirley Wilcher, Sex Discrimination in Education: Legal Rights and Remedies. Washington, D. C.: National Women's Law Center, 1983. pp. 4-4 to 4-7.

[4]"Inside: The Education Department", The Washington Post. October 25, 1983.

[5]James Gladden, Legal Training Conference on Educational Equity. Conference Presentation. National Women's Law Center, Washington, D. C. November 18, 1983.

[6]"ED Switches Position Again in Title IX Test Case" Education Daily. October 18, 1983.

[7]U.S. Department of Justice, Court Brief Filed in Grove City vs. Bell., 1983.

[8]Nancy Balles, The Unenforced Law: Title IX Activity by Federal Agencies Other Than HEW. Washington, D. C.: The National Advisory Council on Women's Educational Programs. January, 1978. p. 3.

[9]U.S. Department of Education, Office for Civil Rights: Second Annual Report. Washington, D. C. March, 1983. p. 12.

[10]Ibid., p. 17.

[11]Ibid., p. 40.

[12]Ibid., pp. 25 and 27.

[13]Title IX Regulations (Get CFR cite)

[14]U.S. Department of Education, "Revision of Policy Interpretations-Title IX and Intercollegiate Athletics". Office for Civil Rights. December 11, 1979.

[15]Robert H. Atwell, Bruce Grimes and Donna Lopiano, The Money Game: Financing Collegiate Athletics. Washington, D. C.: American Council on Education, 1980.

[16]Guaranteed Student Loan/Court Decision on contract. (Get cite)

[17]U.S. Department of Education, Letters of Finding, Office for Civil Rights, 1983.

[18]Thomas Flygare, "Circuits Split on Whether Federal Student Aid Makes Entire College Subject to Title IX". Phi Delta Kappan. June, 1983.

[19]House Resolution 190. "Expressing the Sense of the House of Representatives With Respect to the Need to Maintain Guidelines Which Insure Equal Rights With Regard to Education Opportunity." U.S. House of Representatives. Washington, D. C. May 10, 1983.

[20]National Advisory Committee on Black Higher Education and Black Colleges and Universities, Higher Education Equity: The Crisis of Appearance Versus Reality. Washington, D. C. June, 1978.

[21]The National Advisory Council on Women's Educational Programs and Texas Southern University, Symposium on the Socialization of Black Women. Houston, Texas. September 20 - 21, 1979.

[22]Marjorie Hyer, "Jewish Women Weigh Survival as a Double Minority", The Washington Post. November 26, 1983.

[23]Susan Bailey, "A Concern About Sex Equitable Education for Disabled Students", Concerns. Washington, D. C.: The Council of Chief State School Officers. June, 1983.

[24]Wood, Miriam. "What Role for College Trustees?" Harvard Business Review. Vol. 83, No. 3. May-June, 1983. pp. 52-62.

[25]Howe, Florence; Howard, Suzanne and Strauss, Mary Jo Boehm. Everywoman's Guide To Colleges and Universities. Old Westbury, New York: The Feminist Press, 1982.

[26]U.S. Department of Education, Letters of Finding. Office for Civil Rights, 1983.

[27]Karen Bogart, Judith Flagle and Steve Jung, Institutional Self-Study Guide on Sex Equity for Postsecondary Educational Institutions. Washington, D. C.: American Institutes for Research, 1974.

[28]Caliendo, Nat and John K. Curtice, "Title IX: A Guide for Financial Aid Administrators" The Journal of Student Financial Aid. (Vol. 7, No. 2), May, 1977. pp. 35.

[9]Letter from Attorney General Edward Levi to HEW Secretary, David Mathews, July 20, 1976.

Chapter III. SIGNIFICANT DEMOGRAPHIC AND ENROLLMENT TRENDS INFLUENCING FEMALE PARTICIPARTICIPATION IN STUDENT AID

[1]Alexander Astin, The American Freshman, 1966 - 1981: Some Implications for Educational Policy and Practice. University of

California, Los Angeles and The Higher Education Research Institute, Inc. Prepared for The National Commission on Excellence in Education. May, 1982. p. 48.

[1]U.S. Department of Commerce, Current Population Reports: School Enrollment - Social and Economic Characteristics of Students: October 1981. (Series P-20, No. 373). Bureau of the Census. Issued February, 1983.

[2]U.S. Department of Education, Condition of Education: 1983. Washington, D. C.: National Center for Education Statistics, p. 80.

[4]David Maines, Attrition Processes Out of Mathematics for Undergraduate and Graduate Students. Evanston, Illinois: Northwestern University. January, 1983.

[5]Jane Stallings, Factors Influencing Women's Decisions to Enroll in Advanced Mathematics Courses. Mountain View, California: Stallings Enterprises, Inc. May, 1979.

[6]Irene Frieze, Motivational and Background Factors Influencing Enrollment in College Mathematics Courses. Pittsburgh, Pennsylvania; University of Pittsburgh. 1979.

[7]The Education Backgrounds of State Executives: A Study of Postsecondary Educational Patterns of State Elites. Washington, D. C.: National Institute of Education. May, 1977.

[8]Dorothy Jackson, Feasibility of an Internship Program for Women and Minorities in Educational Research. Washington, D. C.: National Institute of Educational Research. March, 1978.

[9]John Lee, Changes in College Participation Rates and Student Financial Assistance 196), 1974, 1981. Washington, D. C.: Applied Systems Institute, Inc. Prepared for the National Commission on Student Financial Assistance. January, 1983. p. 31.

[11]U.S. Department of Education, The Condition of Education. (1983 Edition). Washington, D. C.: National Center for Education Statistics. p. 135.

[12]U.S. Department of Education, Education Attracts Fewer Academically High Achieving Young Women. By Samuel Peng. Washington, D. C.: National Center for Education Statistics. December, 1982.

[13]John Lee, Changes in College Participation Rates and Student Financial Assistance 1969, 1974, 1981. Washington, D. C.: Applied Systems Institute, Inc. Prepared for the National Commission on Student Financial Assistance. January, 1983. p. 30.

[14]U.S. Department of Commerce, Bureau of the Census, School Enrollment-Social and Economic Characteristics of Students: October 1980. (Current Population Reports-Series P-20, No. 362). Washington, D. C.: U.S. Government Printing Office. May, 1981. p. 7.

[15]Patricia Cross, "The Woman Student" in Furness, Todd and Graham, Patricia (eds.) Women in Higher Education. Washington, D. C.: American Council on Education, 1976. pp. 37 - 38.

[16]Rees, Mina. "The Graduate Education of Women," in Furness, Todd and Graham, Patricia (eds.) Women in Higher Education. Washington, D. C.: American Council on Education, 1976.

[17]U.S. Department of Education Regional Hearing on the Reauthorization of the Higher Education Act. Hearing Transcripts. Kansas City, Missouri. July 7, 1983.

[18]Patricia McNamara and Rita Scherrei, College Women Pursuing Careers in Science, Mathematics, and Engineering in the 1970s. The Higher Education Research Institute. Los Angeles, California: The University of California. May, 1982. p. 46.

[18]Holly Knox, Project on Equal Education Rights and Pamela Surko, Association for Women in Science. Congressional testimony on The Emergency Mathematics and Science Education Act. The House Subcommittee on Elementary, Secondary and Vocational Education and The House Subcommittee on Postsecondary Education. January 27, 1983.

[19]David Maines, Attrition Processes Out of Mathematics for Undergraduate and Graduate Students. Evanston, Illinois: Northwestern University. January, 1983.

[20]The Business-Higher Education Forum, America's Competitive Challenge: The Need for a National Response. Washington, D. C.: American Council on Education. April, 1983.

[21]The National Commission on Higher Education Issues, To Strengthen Quality in Higher Education. Washington, D. C.: American Council on Education. November, 1982. p. 5.

[22]Sandra Friedland, "For Minority Engineers, A GEM of a Program," The New York Times Summer Survey of Education. August 21, 1983. p. 23.

[23]U.S. Department of Education, Condition of Education: 1983. Washington, D. C.: National Center for Education Statistics, p. 80.

[24]Howe, Florence; Howard, Suzanne and Strauss, Mary Jo Boehm. Everywoman's Guide To Colleges and Universities. Old Westbury, New York: The Feminist Press, 1982.

[25]U.S. Department of Education, The Condition of Education. (1983 Edition). Washington, D. C.: National Center for Education Statistics. pp. 116-118.

[26]U.S. Department of Education, Participation of Black Students in Higher Education: A Statistical Profile from 1970-71 to 1980-81. By Susan Hill. Washington, D. C.: National Center for Education Statistics. November, 1983. p. 15.

[27]National Urban League, The State of Black America, 1984. New York: National Urban League. January, 1984.

CHAPTER IV: IMPACT OF FEDERAL POLICY ON STUDENT AID FOR WOMEN

[1]Bruce Johnstone, "Federally Sponsored Student Loans: An Overview of Issues and Policy Alternatives, in Rice, Lois (ed.) Student Loans: Problems and Policy Alternatives. New York: College Entrance Examination Board, 1977. p. 17.

[2]John Lee, Changes in College Participation Rates and Student Financial Assistance 1969, 1974, 1981. Washington, D. C.: Applied Systems Institute, Inc. Prepared for The National Commission on Student Financial Assistance. January, 1983. p. 31.

[3]Mark Heffron, National Norms for ACT Financial Aid Applicants, ACT Student Need Analysis Service. Iowa City, Iowa: American College Testing. 1974 to 1980.

[4]Elaine El-Khawas, Comparison Data From Public, Independent and Proprietary Institutions. Tables compiled for policy seminar sponsored by The American Council on Education and The National Commission on Student Financial Assistance. June 3, 1983.

[4]Susan Nelson, Community Colleges and Their Share of Student Financial Assistance. New York: College Entrance Examination Board, 1980. pp. 18 - 19.

[5]Lawrence E. Gladieux, "The Definition of Independent Student Status Under Federal Student Aid Programs". Testimony before the Subcommittee on Postsecondary Education, Committee on Education and Labor, U.S. House of Representatives. October 27, 1983.

[6]Linda Berkshire, National Student Aid Coalition. Testimony before the Subcommittee on Postsecondary Education, Committee on Education and Labor, U.S. House of Representatives. October 27, 1983.

[7]Robert Lyke, "Commentary on Student Loan Defaults" in Rice, Lois (ed.) Student Loans: Problems and Policy Alternatives. New York: College Entrance Examination Board, 1976, p. 156.

[8]Johnson, Robert. The Role of Educational Debt in Consumers' Total Debt Structure. Purdue University: The Credit Research Center. Prepared for The National Commission on Student Financial Assistance. Washington, D. C. January, 1983. pp. 31-32.

[9]Peter Kuch, "Predicting Default and Bankruptcy: Factors Affecting the Repayment Status of Student Loans." Technical Paper 78-111. Department of Education, Office of Planning, Budget and Evaluation; Postsecondary Programs Division, 1978. and ____, A Study of Selected Educational Institutions and Students Participating in the Direct STudent Loan Program Under the Federally Insured Student Loan Program. Final Report, Cresap, McCormick and Paget; Department of Education, Office of Planning, Budget and Evaluation. September, 1979.

[10]John Lee, Study of Guaranteed Student Loan Default Rates. Washington, D. C.: Applied Systems Institute, Inc. Prepared for The National Commission on Student Financial Assistance. August, 1982. p. 3.

[11]Arthur Hauptman, "Student Loan Defaults: Toward a Better Understanding of the Problem in Rice, Lois (ed.) Student Loans: Problems and Policy Alternatives. New York: College Entrance Examination Board, 1976. p. 150.

[12]John Lee, Study of Guaranteed Student Loan Default Rates - Part 2: Lender Characteristics. Washington, D. C.: Applied Systems Institute, Inc. Prepared for The National Commission on Student Financial Assistance. March, 1983. p. 11.

[4]David Stanley and Marjorie Guth, Bankruptcy: Problems, Process, Reform. Washington, D. C.: The Brookings Institution, 1971. p. 42.

[5]David Cowans, California bankruptcy judge, testimony before the U.S. House Committee on the Judiciary, Subcommittee on Civil and Constitutional Rights. Hearings on the Bankruptcy Act Revision. September 12, 1975. p. 302.

[13]David Osman, Federal Financial Implications of Cumulative Outstanding Volume Under the Guaranteed Student Loan (GSL) Program. Washington, D. C.: Congressional Research Service. December 21, 1982. p. 4.

[14]U.S. Department of Education, Status of National Direct Student Loan Defaults as of June 30, 1982. Institutional Listing. Office of Student Financial Assistance.

[15]National Commission on Student Financial Assistance. Public Hearing of the Appropriate Balance Subcommittee. University of Utah. Salt Lake City, Utah. January 14, 1983.

[9]Rosen, David. Resolving the Contradictions of Federal Public Assistance and College Opportunity Policies: Legislative Recommendations. Prepared for The National Commission on Student Financial Assistance. Washington, D. C. March, 1983.

[10]Dunkle, Margaret. Financial Aid: Helping Re-entry Women Pay College Costs. Project on the Status and Education of Women. Washington, D. C.: Association of American Colleges, 1980.

[11] Julia Kagan, "Survey: Work in the 1980s and 1990s", Working Woman. September, 1983. pp. 30-32.

[12]Mary Moran, "Student Financial Assistance: Private Initiatives", American Education. Washington, D. C.: U.S. Department of Education. June, 1983. p. 42.

[13]Andree Brooks, "For the Woman: Strides and Snags", National Employment Report. The New York Times. October 16, 1983. p. 31.

[14]Barry Bluestone and Bennett Harrison, The Deindustrialization of America: Plant Closings, Community Abandonment, and the Dismantling of Basic Industry. New York: Basic Books, Inc., 1982.

[15]"Professional Opportunities/Help Wanted", The Washington Post. November 6, 1983.

[16]Kathy Sawyer, "Job Bias Claim Settled by GM for $42 Million", The Washington Post. October 20, 1983.

[17]Karen Peterson and Bruce Rosco, "Factors Influencing Selection of Major by College Females," College Student Journal . (Vol. 17, No. 1) Spring, 1983. pp. 32-33.

[18]Ibid.

[19]U.S. Department of Commerce, School Enrollment - Social and Economic Characteristics of Students: October 1980. (Current Population Reports - Series P-20, No. 362). Washington, D. C.: U.S. Government Printing Office. May, 1981. p. 7.

[20]U.S. Department of Education, Condition of Education: 1983. Washington, D. C.: National Center for Education Statistics, p. 118.

[21]Marie Eldridge, Director - National Center for Education Statistics. Testimony before the Subcommittee on Postsecondary Education, Committee on Education and Labor. U.S. House of Representatives. October 19, 1983.

[22]Arlene Olinsky, An Analysis of Financial Aid Utilization by New York State Students, 1981-82. New York: New York State Higher Education Services Corporation, 1983. p. 13 - 14.

[23] U.S. General Accounting Office, Federal Credit Policy on Guaranteed Loans Should be Clarified and Enforced. Washington, D. C.: U.S. Government Printing Office.

CHAPTER V: PARTICIPATION PATTERNS OF WOMEN IN FEDERAL STUDENT AID PROGRAMS AND REVIEW OF REGULATIONS

[1]U.S. Department of Education 1982 Annual Evaluation Report. Office of Planning, Budget and Evaluation.

[2]Ibid.

[3]National Center for Education Statistics. Two Years After High School: A Capsule Description of 1980 Seniors. Washington, D. C., August, 1983.

[4]John Lee, Changes in College Participation Rates and Student Financial Assistance 1969, 1974, 1981. Washington, D. C.: Applied Systems Institute, Inc. Prepared for the National Commission on Student Financial Assistance. January, 1983. p. 30.

[5]Dennis Carroll, "Who Applied for Student Financial Aid" (NCES Bulletin 82-247b) Washington, D. C.: National Center for Education Statistics. January, 1983.

[6]David Gardner, The National Commission on Student Financial Assistance. Public Hearing of the Appropriate Balance Subcommittee. Commission Transcripts. University of Utah, Salt Lake City, Utah. January 14, 1983. p. 144.

[7]Touche Ross & Co., Study of the Cost to Deliver Student Financial Aid on Campus. Prepared for The National Commission on Student Financial Assistance. Washington, D. C. March, 1983. pp. IV-4 to IV-7.

[8]James Q. Wilson (ed.) The Politics of Regulation. New York: Basic Books, Inc., 1980.

[9]Francis Keppel, National Task Force on Student Aid Problems: Final Report Washington, D. C., 1975. p. 72.

[10]Public Law 96-374. Education Amendments of 1980, Title IV, (Part A, Sec. 411).

[11] Malaine Reeves Williams and Laura Kent, Blacks in Higher Education: Access, Choice and Attainment. Los Angeles, California: Higher Education Research Institute. June, 1982. p. 36.

[12]Donald Gillespie and Nancy Carlson, Trends in Student Aid: 1963 to 1983. Washington, D. C.: The College Board. December, 1983. p. 14.

[13]John Lee, Work Patterns of Full-Time College Students in 1974 and 1981. Washington, D. C.: Applied Systems Institute, Inc. Prepared for the National Commission on Student Financial Assistance. May, 1983.

[14]Ralph Olmo, Comptroller of the U.S. Department of Education. Testimony before the National Commission on Student Financial Assistance. University of Utah, Salt Lake City, Utah. January 14, 1983. Public Hearing Transcripts, p. 90.

[14]Richard Ramsden, "GSLP and NDSL - In Search of Synthesis" in Rice, Lois (ed.) Student Loans: Problems and Policy Alternatives. New York: College Entrance Examination Board, 1976. p. 109.

[15]U.S. Department of Education, Justifications of Appropriation Estimates for Committees on Appropriations: Fiscal Year 1984. Education, Volume II. pp. 67 - 68.

[15]Robert Johnson, The Role of Educational Debt in Consumers' Total Debt Structure. Purdue University: The Credit Research Center. Prepared for The National Commission on Student Financial Assistance. Washington, D. C. January, 1983. p. 30.

[16]Correspondence from Earl Lazerson, President of Southern Illinois University at Edwardsville to Alex Lacey, President Sangamon State University, August 13, 1982. Background material for testimony on NDSL defaults conducted by the U.S. House of Representatives, Subcommittee on Postsecondary Education.

[16]John Erlenborn, Oversight hearings on all forms of federal student financial assistance. Subcommittee on Postsecondary Education of the Committee on Education and Labor. U.S. House of Representatives. May 25, 1977. Hearing Transcripts, p. 64.

[17]American Council on Education, Impact of Eliminating SEOG, NDSL, SSIG. Washington, D. C. January 27, 1983.

[18]Robert Fenske and Joseph Boyd, State Need-Based College Scholarship and Grant Programs: A Study of Their Development, 1969-1980. (College Board Report No. 81-7) New York: College Entrance Examination Board, 1981. p. 1.

[19]Letter from U.S. Secretary T.H. Bell to Chancellor John B. Duff, Massachusetts Board of Regents of Higher Education. May 4, 1983.

[20]National Governors' Association, Student Financial Assistance and State Policy. Washington, D. C. Prepared for The National Commission on Student Financial Assistance. March, 1983.

[21]National Conference of State Legislators, State Responses to Federal Policies on Student Financial Assistance: A Survey of State Legislation. Washington, D. C. Prepared for The National Commission on Student Financial Assistance. March, 1983.

[22]Michigan Higher Education Assistance Authority and Michigan Higher Education Student Loan Authority. Annual Report: 1981-82 by Ronald Jursa. Lansing, Michigan: Michigan Department of Education. p. 88.

[23]Illinois State Scholarship Commission, 1980-81 Annual Report. Springfield, Illinois, 1982.

[24]The Massachusetts Higher Education Assistance Corporation, The Massachusetts Governor's Commission on the Status of Women and Shawmut Bank of Boston, We Are Women Helping Ourselves. (Student Financial Aid Information Brochure). Boston, Massachusetts. 1980.

[25]U.S. Department of Education 1982 Annual Evaluation Report. Office of Planning, Budget and Evaluation.

[26]Jerry Davis, The Impact of State Student Incentive Grant Program Funds on the Implementation, Maintenance and Growth of State-Supported Student Grant Programs. Harrisburg, Pennsylvania: Pennsylvania Higher Education Assistance Agency. April, 1982. p. 11.

[27]Janet Hansen, Another Look at SSIG. Washington Office of the College Board. Prepared for The National Commission on Student Financial Assistance. Washington, D. C. March, 1983.

CHAPTER VI: ROLE OF THE FEDERAL GOVERNMENT IN ENCOURAGING WOMEN TO PARTICIPATE IN POSTSECONDARY EDUCATION THROUGH STUDENT FINANCIAL ASSISTANCE

[1]Thomas Shannon, "The Emerging Federal Role in Education", School Board News. Washington, D. C.: National School Board Association November 30, 1983.

[2]U.S. Department of Education, What's Left of Federal Funding for Sex Equity in Education? by Susan Klein and Kathleen Dauito. Washington, D. C.: National Advisory Council on Women's Educational Programs. June, 1982.

[3]U.S. Department of Education, Goals and Performance Priorities of the U.S. Department of Education for Fiscal Year 1984. Washington, D. C.

[4]Alison Bernstein, Elizabeth Foster, and Carol Stoel. Reports from the Fund Projects/Women II 1976-1978. Washington, D. C.: The Fund for the Improvement of Postsecondary Education, 1978. pp. 7-8.

[5]Sara Rix and Anne Stone, Reductions and Realities: How the Federal Budget Affects Women. Prepared for The Congressional Caucus for Women's Issues. Washington, D. C.: Women's Research and Education Institute, 1983. pp. 22-23.

[6]Judith Taggart and Lynn Moore, Closing the Gap. National Federation of Republican Women. Washington, D. C.: The Republican National Committee, 1983. p. 1.

[7]Ibid., pp. 12-13.

[8]U.S. Department of Education, Sex Equity in Education: NIE-Sponsored Projects and Publications. by Susan Klein and Veronica Thomas (eds.) Washington, D. C.: National Institute of Education. May, 1981.

[9]What's Left of Federal Funding for Sex Equity in Education? Ibid., p. 2.

[9]U.S. Department of Education, Fulfilling the Mandate. (Eighth Annual Report) National Advisory Council on Women's Educational Programs. March, 1983. p. 52.

[10]"Special Programs for Students From Disadvantaged Backgrounds; Final Rule. Federal Register, Vol. 47, No. 110. (Part 646). June 8, 1982. p. 24942.

IX: CONCLUSION

[1]David Gardner, "A Time For Re-Examination and Renewal of Commitment", American Education. Washington, D. C.: U.S. Department of Education. August-September, 1982. p. 34.

[2]In The National Interest - Higher Education and the Federal Government: The Essential Partnership. Washington, D. C.: The National Association of State Universities and Land-Grant Colleges, 1983-84.